ACCREDITATION ON THE EDGE

Challenging Quality Assurance in Higher Education

Edited by SUSAN D. PHILLIPS *and* KEVIN KINSER

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Accreditation on the Edge

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Edited by Susan D. Phillips and Kevin Kinser

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Foreword

New-Normal Accreditation: Role, Practice, and Values

We have entered an era of "new-normal accreditation." Accreditation now has a reshaped role, reshaped practices, and reshaped values. A decade of persistent and unprecedented demands and expectations from government and the public, many described in this volume, have been remaking the fundamentals of traditional accreditation. The work is about complete.

At such a moment, reflection such as presented here is vital. We may welcome some of the changes and, at the same time, mourn the loss of some of accreditation's longstanding features. What is this reshaping? Will any of the significant characteristics of accreditation that we have valued remain? Is accreditation, still our primary means of assuring and improving quality in higher education, to be better, worse, or just different?

Historically, traditional accreditation has been a complex combination of, first, overseeing threshold quality: applying standards or minimum expectations of performance and effectiveness of institutions and programs such that the result is quality higher education. Second, accreditation was to encourage and assist with improving quality: At whatever level of performance, what standards or expectations are applied such that a college, university, or program further strengthens itself? Of the two, quality improvement has always been the heart and soul of accreditation, the most powerful commitment that has driven much of this enterprise for a century. In both seeking threshold quality and quality improvement, the standards and expectations were set by accrediting organizations.

The new normal's role is, first and foremost, a compliance and information-sharing or transparency one, above all, assuring and making public an institution's minimum performance in serving students. Expectations and standards for the new-normal role are increasingly set not by accreditors but by government, especially at the federal level, influenced by students, the public, and media. Accreditation, once viewed as an arcane and boring undertaking, essentially invisible outside of higher education, has become public property. With this transition, the quality improvement role, although still with us, has taken a back seat to this compliance role. It is no longer the dominant driver.

When it comes to practice, new-normal accreditation retains the core processes of self-study and peer review that have characterized traditional accreditation. However, these processes are reframed as a result of the dominant compliance role. A self-study process that was once solely about meeting standards focused on academic concerns such as faculty and curriculum is now, at least in part, built around what government thinks is important, for example, nonacademic issues such as the cost of education, student debt, loan repayment and default rates, and results of licensure examinations. And, increasingly, institutions are challenged to provide external verification of the data included in their self-studies. Taking the word of a college or university about its performance is no longer adequate. In the new normal, institutional judgment is suspect and institutional credibility has eroded.

Peer review is also changing, both the process and the object of its examination. As accreditation becomes public property and government both directs how accrediting organizations are to operate and what is central to judgments about quality, two things are happening. First, peer reviewers exercise less of their own judgment about what they examine at a college or university. Their inquiry is circumscribed by federal obligations. Second, more and more of the work of peer reviewers is summative and not formative in nature. Formative evaluation, examination for aspiration and improvement and core to traditional accreditation, has given way to examination for compliance.

Peer review has also included participating in the development of standards and policies that accrediting organizations use to judge quality. Today, however, standards and policy formulation is dominated as much by what the federal government has decided is important as by what academics think. Few accreditors are willing to risk establishing or revising standards or policies without an eye toward what will be acceptable to the federal government. Finally, the role of peers as the primary consumers of accreditation judgment and information has given way to students, government, and the public as the major consumers, with both the nature of the information and how it is provided changing to accommodate the needs of these new, nonacademic audiences.

With regard to values, three have been fundamental to traditional accreditation: commitment to mission, academic freedom, and institutional autonomy. These values, taken together, have long been the core strengths of accreditation. With these values, carried out through self-study, peer review, and formative evaluation, primary authority and responsibility for academic judgment and thus academic leadership rested with institutions and faculty.

While mission remains important in the new normal, ongoing demands for uniformity—common terminology, common standards, common processes, common quality indicators—are undermining, however unintentionally, the power of mission to drive academic judgment. While institutional autonomy is often acknowledged in theory, government and the public have become dismissive of institution-level decision-making, absent regulatory affirmation of university judgment. Academic freedom, while still valued, is under fire politically and socially, constraining the capacity of accrediting organizations to provide effective advocacy.

New-normal accreditation is built on other values, with government presence looming large. The value of government-led uniform and standardized expectations to judge quality supersedes the value of mission. Government and public valuing of diversity, inclusion, and social justice supersedes the value of academic freedom. Subordinating academic judgment to government regulation supersedes the value of institutional autonomy.

Moreover, as indicated in this volume, international developments in quality assurance and accreditation favor new-normal, not traditional, accreditation. Regional norms for practice and performance such as the well-established *European Standards and Guidelines* are spreading rapidly in the Asia-Pacific region and in Africa. Such efforts encourage uniformity and standardization of practice, as well as a stronger role for government.

As suggested years ago by the World Bank, these regional efforts are likely a prelude to worldwide common practice and guidelines, if not standards for quality assurance. The influential United Nations Educational, Scientific and Cultural Organization (UNESCO) is now emphatic with regard to its call for accountability that transcends institutional autonomy, that is, student learning outcomes based and that includes qualifications frameworks worldwide that promote comparability, compatibility, and portability. In the face of such developments, traditional accreditation in the United States, with its emphasis on mission, formative evaluation, and institutional autonomy, looks like a laggard.

With the new normal, then, accreditation still remains central to addressing quality in higher education. However, it has shifted from an academically directed form of self-scrutiny of institutions and programs to strengthen performance to a government-directed form of external scrutiny for compliance based on performance expectations set by government, students, and the public. Many of the suggestions in this volume push back against the new normal; others would solidify this transition.

Even acknowledging that the new normal is the current framework for accreditation is not easy, but it is essential. A central question moving forward is whether, in the context of the new normal, we can sustain at least some of the strengths of traditional accreditation. Is there some way to combine features of both the new normal and the strengths of traditional accreditation?

However unexpectedly, renewed emphasis on institutional autonomy, restoring the academic leadership of colleges and universities, may be a beginning. A return to emphasis on institutional autonomy requires a willingness of institutions and accreditors to take more action with regard to performance and transparency, the dominant concerns of the new normal. It requires that advocates of the new normal acknowledge, respect, and engage these efforts. Two suggestions for institutions are offered here, requiring the support of accreditation.

First, institutions need to make what happens to students much more central to their judgments about performance and quality. Accreditors need to forcefully support this. The actual or perceived failure to do this is a large part of what is driving the new normal's preference for government judgment over institutional judgment.

What students have learned and can do is at the heart of the effective institutional performance—whether students complete their educational goals, graduate, get jobs, or continue their education. Government, students, and the public need to have confidence that institutional claims of effectiveness are based, first and foremost, on evidence of what happens to students. If it is clear that institutions have clear and rigorous expectations of student achievement and reliable evidence of student success, a uniform or standardized approach to student accomplishment and performance that is government driven is not needed.

Second, institutions need to take the lead in transparency about their performance in a more forceful manner and frame their communication accordingly, again supported by accreditors. Today's primary consumer of information about performance is the public, whether students, government, or media. Consumers need information that is current, straightforward, readily understandable, and presented in downloadable and interactive formats. Institutional profiles on performance can be developed for this purpose. We do not need to publish, for example, lengthy self-studies and team reports and action letters. Accreditor profiles of the findings of periodic reviews can be developed for this purpose as well. Some institutions and accreditors are doing this, but a good many are not.

Restoration of institutional autonomy and accreditation's support of this value, accompanied by acceptance in the new normal, is a start. This rigorous recom-

mitment to institutions as the most desirable sources of evidence of performance and transparency brings a key strength of accreditation into the new normal. Going forward, we can benefit from also examining the many issues raised in this volume through the lens of the new normal, seeking to further sustain the strength and value of accreditation.

Judith S. Eaton
President
Council for Higher Education Accreditation

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Accreditation

Introduction to a Contested Space

Susan D. Phillips and Kevin Kinser

With accreditation serving as a significant gateway to more than $120 billion[1] in annual federal student aid, there has been a growing and intense interest in the policies and practices associated with quality assurance in higher education: consumers seek reliable indicators of the quality of their investment, institutions count on the federal aid dollars made possible by their accreditation, and policymakers strive to identify bad actors and understand how institutional failures could have gone undetected. A sampling of headlines conveys the significance of the matter:

"Who Will Hold Colleges Accountable?" (*New York Times*, 2012)
"A Fight Is Brewing in Washington over College Accreditors" (*Washington Post*, 2015)
"The Watchdogs of College Education Rarely Bite" (*Wall Street Journal*, 2015)
"Support for Overhauling Accreditation Raises Hard Questions" (*Chronicle of Higher Education*, 2015)
"Senate Investigative Panel Opens Inquiry about College Accreditors" (*Inside Higher Ed*, 2015)
"Who Keeps Billions of Taxpayer Dollars Flowing to For-Profit Colleges? These Guys" (*ProPublica*, 2015)
"Education Department Beefs Up Accreditation" (*US News & World Report*, 2017)

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"Critics Call for More Oversight of California Accreditation Panel" (*Los Angeles Times*, 2017)
"Predator Colleges May Thrive Again" (*New York Times*, 2017)

Accreditation is "on the edge." It faces a tipping point in which the long-standing relationship between accreditation agencies and the higher education community may not continue without significant change. Whether one believes change is needed or oversold, the fact remains that accreditation has been in the crosshairs of an unusually sustained and bipartisan attack: in the mid-2000s, George W. Bush's secretary of education, Margaret Spellings, issued a report challenging accreditation's primary role as guardian of quality and gatekeeper of federal funds;[2] an alternative to accreditation was suggested as necessary in President Barack Obama's 2013 State of the Union address;[3] and, most recently, the Trump administration's secretary of education, Betsy DeVos, suggested that the Higher Education Act itself is archaic and needs to be replaced, taking with it the justification for accreditation's oversight of US colleges and universities.[4]

Although the tempo of controversy in accreditation has been increasing in recent years, accreditation change and reform has been debated for well over half a century. Over that time—from accreditation's involvement in identifying institutions of higher education under the GI Bill, to the gatekeeping role for federal student aid established by the Higher Education Act (HEA) of 1965, through eight subsequent HEA reauthorizations and regulations to implement HEA changes—the federal requirements for programs and institutions and accreditors have shifted and evolved. Throughout, the accreditation system adapted. New sectors of higher education have emerged as well, particularly those in the for-profit area and in online learning, that have posed special challenges for accreditation. And now, additional questions have been raised about the accreditation of institutions that have significant failures or unacceptable business practices.[5] Student debt has been climbing,[6] often disconnected from the graduate's ability to repay the federal loans. For many, these problems demonstrate that accreditation is no longer the HEA's "reliable authority" that can be trusted with approving institutions for billions in financial aid. Even with its history of adaptation to new circumstances and new institutional forms, accreditation is seen as in opposition of needed innovation by some, and as an inadequate gatekeeper by others. A significant drumbeat of concern is heard: Are accreditors doing their job? Can they do the job they have been given? Should they even be given that job? If not them, then who?

These, then, are the fundamental questions that are challenging not only accreditation's ability to adapt once again but also whether the policy environment would continue to welcome the kind of quality assurance models that accreditation represents. As Eaton says in her foreword, this is an era of "new-normal accreditation." Assumptions of the past may not hold in the future. At this murky point where there is no clear direction from policy leaders, and with myriad conflicting viewpoints from defenders and detractors of the status quo, it is important to take stock of the debate the higher education community faces today.

Accreditation: A Brief History

With the first accreditation agency formed in 1857,[7] accreditation developed as a way for colleges and universities to identify and distinguish themselves for the purposes of student credit transfer and degree recognition.[8] Over time, accreditation became a voluntary process of self-study and external peer review of an institution's (or program's) educational quality and integrity using a set of agreed-upon standards for the purposes of accountability and improvement. Throughout the twentieth century, more accrediting bodies were formed to address the quality assurance and quality improvement needs of an increasing number and variety of institutions and programs. In the course of developing common standards, as well as policies and procedures to govern the accreditation process, accreditors and institutions grappled with such issues as common units of measurement, new forms of delivery, and changing financial models.[9]

In what might be considered one of the most significant points in the evolution of higher education accreditation, the Servicemen's Readjustment Act of 1944 (also known as the GI Bill) launched an exponential expansion of students seeking higher education, and the availability of public funds to support that education. Reacting to the unexpected interest that veterans had in higher education funding through the GI Bill, the federal government began looking for a way to ensure that the financial support provided by the federal government to students was being used in a quality educational endeavor. Accreditation agencies were tapped to fill this role starting with the 1952 GI Bill, and they became firmly embedded as gatekeepers to federal funding with the passage of the HEA of 1965. For fifty years, through successive reauthorizations of the HEA, accreditation agencies have been the path to access for most HEA Title IV federal student aid as well as other federal education funds,[10] as long as those accreditors have been reviewed and approved by the federal government as a "reliable authority as to the quality of

education or training offered" by the institutions of higher education or programs they accredit.[11]

Today, higher education covers an extraordinary breadth of institutions: more than 7,700 public, nonprofits, and for-profits in the United States offer education and training from the certificate level to associate's degrees, baccalaureates, and master's and doctoral degrees. These institutions range from single-purpose (e.g., law, cosmetology, medicine) through the comprehensive and offer programs from vocational to liberal arts to professional. They serve learners of all ages, with student enrollments that range from fewer than 500 to more than 100,000.

Overseeing this vast and diverse enterprise is the "triad" of the federal government, the states, and the accreditation agencies. Each of these three overseers brings a particular focus and expertise. Generally, the federal interest is in access to higher education and the use of federal funds. The state focuses on institutional authorization, coordination, and operation, particularly in the public-sector institutions. It also has a consumer protection function, particularly in the private sector. The accreditation agencies perform quality assessment and assurance. (The triad and its functions are described in detail in chapter 8, Ewell.)

As a part of the triad, the accreditors that review and attest to the quality of the US educational panoply number in the hundreds. However, fewer than one hundred are formally reviewed and recognized by either the US Department of Education or the Council for Higher Education Accreditation (CHEA)[12]—a nongovernmental association of more than 3,000 institutions of higher education—or both. The focus of the recognized accreditors might be on specific educational programs (e.g., nursing or accounting), whole academic divisions (e.g., business schools), or entire institutions of higher education. Sometimes accreditors operate in a single state, or in a circumscribed geographic region. Others operate nationally and even internationally. Accreditors are generally categorized as "regional" (addressing institutional-level quality in a specific area of the country), "national" (accrediting institutions across the nation), or "professional," "specialized," or "programmatic" (addressing quality at the program level). All accreditors in the United States are nongovernmental, nonprofit, voluntary membership organizations.

The accreditation process entails several elements, beginning with the given accrediting agency or organization establishing a set of quality standards, in collaboration with its membership and other stakeholders. Institutions (or programs) undertake a study of their own performance against those quality standards, develop plans in areas in need of improvement, and submit a "self-study" to the accrediting agency for peer review. A team of peer reviewers evaluate the

submitted documents, conduct a site visit, and submit findings to the central decision-making body of the organization. Accrediting decisions made by that central body might range from denial of accreditation to "pre-"accreditation to full accreditation for a designated period of time (typically ranging from three to ten years). Once accredited, an institution or program then engages in a periodic re-review, in which the self-study, peer review and site visit, and accreditation decision action (which, for a previously accredited institution or program might now include revocation of accreditation) are repeated at specified intervals. Taken together, the elements of the accreditation process yield quality improvement in the accredited institutions and programs, as well as quality assurance for accountability purposes.

Just as with institutions and programs, accreditors vary in how they pursue their quality improvement and assurance activities, and there are many nuances in the basic accreditation process just outlined. But for those recognized by the Department of Education or CHEA, regular reviews of their procedures entail an extensive process of evaluation and documentation about the accreditor's standards, processes, and outcomes.[13] Of particular note is that to establish eligibility for HEA Title IV federal student aid or other federal funds, the institution (or, in some cases, program) must be accredited by an accrediting agency that is recognized by the Department of Education. The HEA specifically requires the federal recognition process to consider standards in areas such as faculty, curriculum, facilities, fiscal and administrative resources, and student achievement. Recalling that what is at stake in the federal recognition process is access for students to more than $120 billion in federal funds, it would not be surprising that this process also includes attention to how well the accrediting agency is tending to its federally designated responsibilities to mind the financial and other health indicators of institutions for which it is serving as the "Title IV gatekeeper." Further, with rising concerns about the use of Title IV funds, federal effort has also been recently directed to creating publicly accessible data bases about institutional and accreditor performance.[14]

Challenge and Controversy

The challenge and controversy surrounding accreditation today comes from all directions. The many views offered open different windows into what higher education—and the nation—needs from accreditation and what accreditation can provide. Accreditors raise concerns about the tensions between quality assurance and quality improvement, and decry being blamed for activities that lie outside

their control and responsibility. Institutions and other education providers denounce accreditation as costly, intrusive, and stifling of innovation and autonomy. Policymakers argue that the current system of quality assurance does not serve the nation's goals well and worry about the taxpayer dollars devoted to student aid. Consumers wonder about the validity of the accreditation imprimatur and call for better protection and clearer links to subsequent employment. Each voice in the controversy advances a desired resolution, and each of those proposed solutions is notable. Considered alone, however, single perspectives are incomplete. What is needed, and what we hope to accomplish here, is to bring together multiple and competing viewpoints to give a comprehensive picture of accreditation on the edge, and to map the contested space that must be navigated if a viable path forward is to be forged.

Indeed, there may be no more critical time than now to examine accreditation closely. A new administration is focusing on reducing government regulation, while the reauthorization—or repeal—of the HEA is waiting in the wings to serve as a vehicle for reform. The value of accreditation in its current form has been questioned by politicians and policymakers across the political spectrum, making accreditation a rare bipartisan issue in a divided Washington. The combination of voices in this volume portray how accreditation has become such an important feature of US higher education, and how it stands at a pivotal and contested space between those who see it as an invaluable resource to ensure the quality of the system and those who look at it as a barrier to needed reform. This broad view of the challenges, tensions, and debates surrounding quality assurance and accreditation in higher education is essential information and context for those seeking to shape the future course of accreditation.

Toward this end, we have brought together the expertise of accreditors, institutions, policymakers, and consumers to illustrate the complexities of this pivotal and contested space. Reflecting a balancing act that represents how we see both the tenacious and tenuous nature of accreditation on the edge, our intent is to portray a range of positions rather than articulate a single voice that critiques or celebrates accreditation today. Furthermore, these positions are often in disagreement, reflecting the messy reality that must be both accommodated and reconciled in crafting a path forward. Authors approach their chapters by looking at the problems facing accreditation from a particular point of view, informed as much by experience and philosophical perspective as by objective analysis of data. We asked them simply to offer their perspectives on the current state of affairs, and what, if anything, should be done about it. We are not, therefore, attempting to provide

comprehensive coverage of all the issues facing accreditation (e.g., how to think about institutional effectiveness, how to develop a campus culture of assessment, how to measure student learning, how institutions can benefit from the accreditation process), all issues for which there are many existing resources.[15] Nor do we give accreditation the responsibility to solve all of the interlocking issues of higher education cost relative to higher education outcomes, though we do believe accreditation has a role to play, as articulated by several authors in this volume. In short, we have gathered leading voices about accreditation today and have asked them reflect—from their particular vantage point and expertise—on why the system looks like it does and what could be different in a reimagined accreditation world.

We begin with the perspective of accreditors. The chapters here focus on the work of the array of accreditation agencies and the pressures/conflicts with the roles they are being asked to fulfill, given their historical mission and tradition of collegial peer review. This part leads off with Manning (chapter 2), writing on what regional accreditation is, why it is that way, and how and why it works. Matthews (chapter 3) next offers a series of important points about accreditation's critics and how national accreditors have responded. Vibert (chapter 4) takes up the perspective of programmatic/specialty/professional accreditors and the distinctive pressures felt by this segment of the accreditation community. These authors make it clear that accreditation itself is not a monolithic entity, and its distinctive histories and functions should inform reform proposals.

The second part takes the perspective of institutions, focusing on the providers of higher education and their experience of the system of accreditation. While there have been significant concerns about the financial costs of accreditation/regulation,[16] the contributors here focus on the stressors in the current accreditation system, the efforts made by institutions to comply with accreditation demands, and the challenges inherent in working within a quality assurance system that often seems out of sync with the higher education marketplace of today. Neal and Alacbay (chapter 5) offer an analysis of the inherent conflicts and hindrances for institutions because of accreditation oversight, and point to a desired alternative to address those issues. Horn and Dunagan (chapter 6) present case studies to address the constraints that the accreditation process brings to innovation, beginning with business model perspectives on how innovation happens (or does not). LeBlanc (chapter 7) describes the Educational Quality through Innovative Partnerships program (EQUIP), launched by the US Department of Education in 2016, and articulates what that experiment can and should provoke in terms of discussion and modification of quality assurance in a time when the very nature of higher

education is shifting. The authors discuss different proposals that range in the amount and nature of change in the relationship of accreditation and institutions.

The third part addresses the perspective of policymakers. Here, the focus is on the policy environment and the role of accreditation in institutional oversight and regulation both as an agent of and independent from government regulators. To begin, Ewell (chapter 8) writes about the conflicting issues of federal, state, and accreditor actors in quality assurance in higher education, examining the roles, interactions, and limitations of the triad. Bergeron (chapter 9) provides a primer on the federal funding of higher education in the United States and highlights the risk management strategies—including accreditation—that are needed to protect those funds. Studley (chapter 10) offers an important challenge to accreditors to take a more central role in policy development and outlines critical and unique competencies that accreditation can and should bring to that charge. And Green (chapter 11) presents a review of how US accreditation operates in an increasingly global context. Each author suggests a different policy lens through which to view accreditation's role in higher education, showing the complexity of the accreditation-policy nexus.

In the fourth part, the focus is on the perspective of consumers—prospective students as well as employers—and how accreditation serves (or does not serve) their needs. To begin, Koc (chapter 12) offers the perspectives of employers, including their views as significant consumers of the product of higher education. Schneider and Peek (chapter 13) make a case for how student choices about higher education could be improved by better data served to students in ways more attuned to their needs and decision processes. Nassirian and Harnisch (chapter 14) offer a consumer information and protection frame on the question of quality assurance, and provide a thorough review of accreditation's role in the problems of higher education quality that have emerged over the past twenty years. Across these chapters, the purpose and value of accreditation within higher education varies according to assumptions about who the end user is supposed to be and what that user can and should expect from the accreditation imprimatur.

Finally, we close by drawing together the main themes and controversies, with an emphasis on the diversity and interconnectedness of perspectives the chapter authors provide. Key here is that the combination of voices in this book brings together viewpoints that are not often in the same conversation, even though they are addressing the same topic, problems, and dilemmas that accreditation poses. Each, however, responds to one or more of the complicated and evolving goals of accreditation. In the final chapter, we look to unpack the critical issues

that accreditation reform needs to address in this fast-changing higher education environment.

NOTES

1. Although the "more than $120 billion" estimate for federal student aid is used across this volume, it is a very conservative figure. Federal student aid available under the Higher Education Act Title IV includes both grants and loans (see https://www2.ed.gov/about/overview/budget/budget17/summary/17summary.pdf, p. 50, for a recent estimate). However, the federal student aid also includes tax credits that would extend approximately $20 billion above the budget figure. There is also significant federal funding available in a number of other educational programs and grants across such agencies as the Department of State, the Department of Defense, the Department of Homeland Security, the Department of Veterans Affairs, the Department of Health and Human Services, the Federal Center for Medicare and Medicaid Services, and the Federal Prison System. Access to this funding is available to students and institutions where the institution is accredited by an accreditor recognized by the US secretary of education.

2. Doug Lederman, "The Spellings Plan," *Inside Higher Ed*, September 26, 2006.

3. Libby Nelson, "On Notice, Again," *Inside Higher Ed*, February 13, 2013.

4. Adam Harris, "Landmark Law on Higher Education Should Be Scrapped, DeVos Suggests," *Chronicle of Higher Education*, June 21, 2017.

5. Ben Miller, "ACICS Must Go," *Center for American Progress*, June 6, 2016, https://www.americanprogress.org/issues/education/reports/2016/06/06/138826/acics-must-go/.

6. Debbie Cochrane and Diane Cheng, *Student Debt and the Class of 2015* (Oakland, CA: The Institute for College Access and Success, 2016), accessed July 7, 2017, http://ticas.org/sites/default/files/pub_files/classof2015.pdf.

7. Four recent publications provide further details on the historical evolution of accreditation: Barbara Brittingham, "Accreditation in the United States: How Did We Get to Where We Are?" *New Directions for Higher Education* 2009, no. 145 (2009): 7–27; Peter T. Ewell, *US Accreditation and the Future of Quality Assurance* (Washington, DC: Council on Higher Education Accreditation, 2008); Elaine El-Khawas, *Accreditation in the USA: Origins, Developments and Future Prospects* (Paris: International Institute for Educational Planning, 2001); and Paul Gaston, *Higher Education Accreditation: How It's Changing and Why It Must* (Sterling, VA: Stylus Publishing, 2014).

8. Ewell, *US Accreditation and the Future of Quality Assurance*.

9. Ibid.

10. See n. 1 concerning federal funding beyond the "$120 billion."

11. Recognition of Accrediting Agency or Association, 20 USC § 1099b (2009).

12. See the website for CHEA: www.chea.org.

13. See "Accreditation in the United States," *US Department of Education*, https://www2.ed.gov/admins/finaid/accred/accreditation_pg12.html#Part602-SEcretary%27sRecognition and https://www.chea.org/userfiles/Recognition/Recognition-Policy-2010.pdf.

14. "College Scorecard," *US Department of Education*, accessed July 7, 2017, https://collegescorecard.ed.gov/; National Advisory Committee on Institutional Quality and Integrity, "Recognized Institutional Accreditors: Federal Postsecondary Education and Student Aid Data," *US Department of Education*, accessed July 7, 2017, https://www2.ed.gov/admins/finaid/accred/accreditor-dashboards.pdf.

15. See, for example, Patricia M. O'Brien, ed., *Accreditation: Assuring and Enhancing Quality*. New Directions for Higher Education (no. 145) (San Francisco: Jossey Bass, 2009); Linda A. Suskie, *Assessing Student Learning: A Common Sense Guide* (Hoboken, NJ: Wiley, 2010); and George D. Kuh, Stanley O. Ikenberry, Natasha A. Jankowski, Timothy Reese Cain, Peter T. Ewell, Pat Hutchings, and Jillian Kinzie, *Using Evidence of Student Learning to Improve Higher Education* (San Francisco: Jossey-Bass, 2015).

16. William Kirwan and Nicholas Zeppos, *Recalibrating Regulation of Colleges and Universities: Report of the Task Force on Federal Regulation of Higher Education* (Washington, DC: American Council on Education, 2015).

PART I / Perspectives of Accreditors

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Quality Assurance and Quality Improvement

Why and How Accreditation Works

Sylvia Manning

The perspective of accreditors begins with a chapter written from the point of view of regional accreditation, the largest and oldest source of traditional institutional quality improvement and assurance. Offered here is an analysis of what regional accreditation is, why it is that way, and how and why it works.

Accreditation derives its value from two principles: (1) in this world, there is no standing still: an institution is either improving or declining; and (2) the only effective agent to assure the quality of an institution is the institution itself. Accreditors usually recognize these principles only tacitly; they are, nonetheless, fundamental.

This chapter attempts to elucidate the two principles and to describe the benefits that flow from their observance as well as from other aspects of accreditation practice on the part of regional accreditors. Though institutional accreditation in the six US regions has much in common with the practices of national institutional accreditation and programmatic or specialized accreditation, this chapter makes claims only for regional accreditation. It sets the stage—what and why accreditation is, how and why it works—from the perspective of the largest and most familiar sector: regional institutional accreditation. Programmatic and national accreditation, especially in the fields of licensed professions, have both advantages and limitations that are not addressed here (but see chapter 3, Matthews, and chapter 4, Vibert).

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Preamble: Quality and Higher Education

Confusion, disagreement, vagueness, and cross-purposes have racked the debates about quality in higher education, debates that have escalated in recent decades and occasionally focused on accreditation. Quality in higher education is a mushy concept. It is easier to say what quality is not, or what quality is not only: it is not only job training, it is not measurable by employment rates alone, it is not a graduation rate, it is not a debt-repayment rate, it is not only the acquisition of basic skills, it is not only the accumulation of information, and it is not even all those things taken together.

General parlance includes a wide range of postsecondary training under the umbrella of higher education, an openness that is sometimes useful but that creates difficulties by conflating very different purposes. What is involved in a quality education in nursing is different from what is involved in a quality education in graphic art, both are different from a quality education in history, and all three are different from a quality preparation in air cargo management. They have basics in common, but to judge only the fundamentals is to ignore what ultimately matters.

Most institutions of higher education offer dozens, often hundreds, of programs. Institutional accreditation does not review specific programs: it looks at courses or programs as examples of particular institutional policies and practices in action. That is one reason higher education needs specialized or programmatic accreditation as well. Institutional accreditation looks at whether the institution has in place practices and resources that enable it to provide quality education in whatever variety of programs it offers and to whatever range of students it offers them. We may yearn for a static, nationally normed measure or set of measures that would allow us to rank or at least categorize institutions by something called "quality," but we should just give it up. In a healthy institution, what constitutes quality, especially at the institutional level, will be a subject of endless debate because quality not only varies by purpose but even within a given purpose is constantly evolving. The same is true on the broader landscape of higher education as a whole.

More or less explicit in the documents of regional accreditors are the understanding that higher education is a public good and the expectation that the institutions they accredit will share that understanding. The New England Commission, for example, states that its standards "offer a perspective that stresses the public purposes of higher education."[1] The Senior Commission of the Western Association is emphatic: "Accreditation is committed to the application of stan-

dards of performance, while affirming that high-quality education, irrespective of the different purposes of individual institutions, is in itself a contribution to the public good."[2] The Higher Learning Commission embeds the expectation in its criteria: "Actions and decisions reflect an understanding that in its educational role the institution serves the public, not solely the institution, and thus entails a public obligation."[3]

Its orientation to the public good shapes accreditation. Attention to the public good is not the same as consumer protection. At one extreme, consumer protection means protection against fraud and abuse of funds, criminal activities that accreditors do not have the legal means to investigate. In its milder forms, such as assuring that institutions provide honest information to students, accreditors are active, mainly through their requirements for integrity and transparency. Nonetheless, accreditors do not regard higher education as a matter of consumption. For regulatory oversight, what comes first may be the number of degrees produced at a reasonable price; for accreditation, what comes first is the quality of education that will enrich society and the individuals within it.

For an individual, a quality education is one that enables the person to grow—not in size, not in wealth, but in capability and efficacy. Of course, increased wealth may be the ultimate goal or a desirable outcome, but the quality of education inheres not in the wealth that may result but in the growth in capability and efficacy that in turn produces the wealth. This is as true for culinary arts as for neurosurgery. A quality institution offers such education and also itself grows—not in size, not in wealth, but in capacity and efficacy. That is the assumption embedded in what follows.

The Mandate for Improvement

It is perhaps natural on first approach to think of accreditation as the application of a fixed set of standards, preferably quantified, against which an institution is measured. Those standards might include a specified number of books in the library (the favorite canard of early twenty-first-century accreditation bashers) or a specified percentage of students who graduate in four years after entering the institution as first-time freshmen, and many others that are more reasonable and appropriate. If one thinks of accreditation that way, then it is understandable that elite institutions are occasionally offended by the criticisms of accreditors. Because they see themselves as setting the bar of excellence to which others aspire, it can seem to them absurd to be criticized on the basis of that bar, especially if the criticizing body includes some who merely aspire.

When I joined the Higher Learning Commission in 2008, one of the finest liberal arts colleges in our region was incensed at a requirement that it do more with regard to assessing student learning. A similar situation a few years later in the Middle States region led an Ivy League president to propose a separate accreditor for elite research universities. In both instances, it is possible that the accreditors had misjudged the institution, because accreditation is not a science and misjudgments occur. The posture of the institutions, however, was based on a conception of accreditation that would make it impossible for the accreditor to offer them any criticism. These are indeed outstanding institutions. The issue for accreditation, however, is not whether the institution is good enough (in these instances, it surely was) but whether it is as good as it could be tomorrow (which it never is).

Hence the mandate for improvement. There is no standing still: an institution is either improving or declining. Because an institution sustains quality only by continuous improvement, quality assurance must include assurance that there is an ongoing process of quality enhancement, even for institutions at the highest level of excellence.

Some regional accreditors identify the mandate as a distinct requirement. The Southern Association, for instance, requires a Quality Enhancement Plan, in which the focus is on an institutional course of action to enhance student learning, as part of its core requirements.[4] The Higher Learning Commission requires a Quality Initiative for its Open Pathway and promotes a practice of continuous improvement in its AQIP Pathway[5]—an initiative often focused on such goals as enhancing student success or program planning and review. Others explicitly identify improvement as a governing condition for all their standards. The New England Commission on Institutions of Higher Education, for example, states: "the Commission expects affiliated institutions to work toward improving their quality, increasing their effectiveness, and continually striving toward excellence."[6]

At the same time, accreditors maintain a concept of minimum standards, sometimes quantified[7] and oftentimes not. For an accreditor to grant, withhold, or attach conditions to its accreditation, it must be able to offer a basis for its actions, and the basis must lie in an institution's success or failure in meeting the standards and requirements for accreditation. The position of the accreditor thus becomes something like, "The institution must meet these standards at a minimum, but meeting them at a minimum is not enough." The position may seem anomalous, but it works. It allows the accreditor a demonstrable basis for its actions, it allows flexibility to address the very different circumstances and missions of different institutions, and it also creates an expectation of continual improvement.

There are institutional indicators that can be used as minimum standards for purposes such as institutional eligibility for federal or other funds, but minimum standards do not constitute quality. Quality assurance requires of institutions an aspirational understanding of its standards, a posture that impedes complacency. By demanding a culture of improvement, accreditation creates a basic condition for quality in higher education.

Assuring Quality: Capacity and Will

In 1998, four countries—France, Germany, Italy, and the United Kingdom—initiated what became known as the Bologna Process for the European Higher Education Area, which now includes 50 countries. The process is based in an alliance of the participating governments for the purpose of reforming and improving higher education.[8] Periodic meetings of the ministers for education from participating countries result in communiqués enunciating principles and goals. The Berlin Communiqué of 2003 stresses "the need to develop mutually shared criteria and methodologies on quality assurance." In that context, the ministers state: "[T]he primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality framework."[9]

Because the ministers present this statement as consistent with a principle of institutional autonomy, it is possible to imagine that the statement is a politically necessary sop to the concerns for national autonomy that underlie all cross-border work in Europe. But it is also a practical necessity, a recognition of the diversity of institutions and programs, and above all of the need to assure quality on the ground and all the time. The Berlin Communiqué makes the point more clearly than any corresponding American document:[10] Quality that is sustained every day of every week cannot be assured by an external entity, be that a government, a ministry, an accreditor, or any other body.

What can be assured is that an institution has both the capacity and the will to assure its own quality.

Capacity

Capacity means the resources to produce quality. These resources include a qualified faculty; classroom, laboratory, and studio facilities; print and electronic media; available, up-to-date technology; and the ability of students to access resources and support services. Some critics of accreditation like to deride these resources as inputs, the favorite being the number of books in the library. It is

true that even before the Internet era, when the sources of written information were on paper and microfilm, a well-stocked library could tell us nothing about the quality of education provided. But it could tell us whether a basic condition for providing good education was present. That remains true today, except that the narrower measure of paper and film has been replaced with access to information sources, many of them electronic.

The resources that accreditation reviews constitute the infrastructure that supports quality. These things alone do not guarantee a good education, but their absence suggests a high likelihood of a poor one.

Underlying all the resources are an institution's finances. This is not because accreditation favors the wealthy or because wealth alone means quality. An institution may be well-off financially but spend foolishly, neglecting critical areas in its programs of education. More commonly, an institution with fewer resources is challenged to manage carefully. Therefore, accreditors look at an institution's finances and may place an institution on notice or probation not because the institution does not have good standards and practices but because it is impoverished. It may have the will, but it lacks capacity. Part of what accreditation assures is that an institution will be around long enough for its students to graduate.[11]

This emphasis on capacity helps to sustain the quality of higher education. For public institutions, accreditation puts pressure on governing bodies, especially state and local legislatures inclined to underestimate the public good of higher education, to provide the financial support institutions need to achieve quality. For all institutions, it provides a check against expanding programs and offerings to the point that an institution's resources are stretched beyond its capacity to sustain quality.

There are exceptions, and regional accreditors have been more willing to allow valid exceptions than is generally recognized. But when they do—when they allow, for example, that an institution's practice may result in quality programs without the oversight of a permanent full-time faculty—they place a high burden of proof on the institution. In this matter of exception, accreditation is inherently conservative. It is not opposed to innovation, but it is cautious about embracing unproven deviations from the inputs that serve as proxies to predict ongoing good outcomes.

Will

An institution may have plenty of capacity, but insufficient will—will, that is, to assure quality in its education. The lack of institutional will may come from a variety of sources: complacency, excessive focus on other purposes such as re-

search or growth or athletics or profitability, external interference, and so forth. The source is never an acceptable excuse: the institution must have the will and it must demonstrate that will, in action, to its accreditor.

An institution demonstrates its will through practices such as curriculum approval and program reviews. It submits its courses and programs to examination and critique, internally or with the advice of external reviewers. In fields that require licensure, it seeks the appropriate programmatic or specialized accreditation.

Ongoing practices assure the quality of resources. Though shared governance may appear to be an ideological principle, for accreditation it is practical: it yields a number of processes that ensure the quality and currency of what is taught. To mount a course in advanced chemistry, for example, an institution needs to start with a qualified chemist, whose judgment defines content and governs the provision of chemistry materials and a physical or virtual laboratory.

An institution also demonstrates its will through considered attention to the outcomes of its programs. For more than two decades, accreditation has led the academy to increasingly sophisticated attention to student learning, framing assessment to focus on improvement in students' learning rather than as a coarse instrument of accountability. As everyone familiar with the debate knows, the problem with student assessment for accountability is that it makes institutions focus on looking good. Accreditation wants an institution to seek out precisely where it is not very good and furthermore to act on what it finds to make itself better. Assessment of student learning, in other words, must also lead to efforts to improve. For these reasons, accreditors have preferred approaches to assessment that employ the same faculty who plan the programs and teach the courses and that seek in-depth understanding of student achievement. A culture of quality improvement often takes root here.

More recently, accreditors have also placed emphasis on an institution's understanding of its students' persistence and completion rates. An institution should feel a need to know whether students are learning what the institution thinks it is teaching and also whether students are staying around long enough to complete their programs. Many actors in today's higher education arena ask those questions, but most do it for purposes of accountability, with less interest in the reasons that results may not be as good as they should be. For accreditation, an institution's grasp of those reasons and its actions in response to them are an index of the institution's commitment to the public good.

An institution reveals much about its will to assure educational quality through the decisions of its budgeting. Simplistically put, an institution with a thriving

recreational enterprise and a starving academic effort is not assuring the quality of its education. Accreditors examine budgets to see what they say about institutional priorities and focus. Emblematically speaking, accreditation provides a degree of pressure to build laboratories before stadiums.

Through these mechanisms, accreditation assures that institutions are examining their quality beyond gross indicators, at the more substantial and meaningful levels of real education. Institutions cannot assure their own quality, day to day and week by week, unless appropriate policies are in place and the institution acts on them consistently. Accreditation thus leads institutions to develop cultures of self-criticism and improvement focused on their mission as educators.

The Periodic Self-Study

While an accredited institution is expected to engage in continuing practices of self-assessment and improvement, accreditation requires a periodic (five years, seven years, ten years) effort of formal, organized review, generally known as self-study, to reaffirm the institution's accreditation. For this process, an institution may undertake certain kinds of self-examination it does not do regularly. Most important, by this process the institution demonstrates, to an external body called the accreditor, that it has the appropriate resources, policies, and practices—capacity and will—to assure quality.

Accreditors require the self-study to articulate an institution's mission and to demonstrate that its activities are in accordance with that mission. For the institution, the questions raised in doing this constitute a check against drift. If the institution has unconsciously drifted from its mission, it needs either to pull back or to redefine the mission. Clarity of mission drives clarity of action.

At least equally important is the mission statement's (or statements') role in framing the self-study and guiding the reviewers. An institution dedicated to serving graduates of poorly performing high schools is very different from an institution that seeks the most academically competitive students, and both are very different from an institution focused on adult learners several years beyond high school. Though the accreditor's standards will be the same for all the institutions it accredits, the standards will be understood differently for different institutions. A six-year graduation rate of 75 percent may be a signal achievement for the institution serving graduates of poorly performing high schools, damning for a highly selective institution serving the most academically competitive students, and irrelevant for an institution focused on working, adult learners.

In a broader context, regional accreditation's emphasis on mission in its evaluation of institutions permits the diversity of institutions that is widely recognized as a major strength of US higher education.

The self-study is not without cost, as is the assurance visit that generally follows it. If the institution treats the process as merely a load of paperwork to be filed and forgotten, then indeed it is a high cost. If its only purpose is to create access to federal student aid funds, it is excessive. Over time, most institutions, as well as the accreditors, have learned that the process of accreditation is as worthwhile, or not, as the institution chooses to make it. In recent years, accreditors have lightened that burden where possible, particularly by easing the reporting effort through the acceptance of electronic submissions.

A self-study can achieve for institutions what the process often called "prioritization" attempts, without the threat that prioritization implies. It invites assessing the institution's strengths and weaknesses at the program level, improving efficiency, rebalancing the budget, and adjusting the strategic plan—in sum, setting the stage for a series of good decisions made before a crisis, not during.

Well done, an institution's self-study for accreditation orients the institution to a posture of aspiration, frames its plans for improvement, and assesses its performance in assuring its own quality. It involves many people on a campus and provides occasions for groups to interact that in the normal course of business do not. It is more effective than a review without institutional engagement in a way similar to the difference between telling people that they have done poorly on a test and having them reach that conclusion by grading the test themselves: it creates the understanding and involvement that prepare them to do better.

The Circumstances of Accreditation

Peer Review

Accrediting bodies are not agencies but rather commissions of associations. In regional accreditation, these associations are associations of the institutions themselves. Thus the standards and expectations come from the collective wisdom of the providers of education. If one believes that the entire enterprise is corrupt, as some do, then this practice is self-dealing and unaccountable. If one believes that in complex matters, judgments and the standards for judgment are best set by people deeply versed in those matters, then this makes sense—as it makes sense, for instance, for standards of medical practice to be set by physicians.

But peer review is more than a matter of experts as opposed to a general public. Judgment by a panel of peers tends to promote reasonableness. Because the regional accreditors draw upon a broad and evolving group of practitioners, the standards and practices of regional accreditation are kept in touch with the realities of practice. The accreditors invite their institutions to regular conferences and workshops, attended by thousands, in which not only do the institutions learn from one another but the accreditors learn from the institutions. Individuals from these institutions serve as visitors, reviewers, and decision-makers for accreditation. The constant movement between practice and review means for accreditation a constant inflow of understanding of the circumstances and challenges institutions face. Accreditation thus regenerates itself from the well of real, current experience in the field.

Moreover, accreditation protects itself against disconnect from the interested public by including members of the public in its peer-review corps and its decision-making bodies. But in truth, the numbers of the interested public are small, mainly because accreditation is highly technical, detailed, and sometimes boring. In reality, the alternative to peer review is a fixed bureaucracy, which is usually responsive to neither those it oversees nor the public. A fixed bureaucracy relies upon rules that lead to oversimplification, rigidity, and irrelevance. It will train assessors to spot keywords or check boxes, and in the interest of consistency will seek answers that are numerical or confined to yes/no options, foregoing the complexity and nuance of the experiential knowledge that peer reviewers bring to bear. Institutions would pass or fail such a test but would not learn or improve from the experience, as they do from accreditation.

If one assumes that the institutions are genuinely interested, at least collectively, in providing quality education, then responsiveness to the institutions collectively on the part of the quality assurance system, or accreditation, is a good thing.

Objections to the peer-review system usually involve an assumption of some sort of bias. One is that peer reviewers will indulge a conflict of interest, that reviewers from one institution will be kind to the institution they review in the hope that others will be similarly kind to them. Since it is not possible (because it is not permissible) that a reviewer from Institution A will review Institution B if someone from Institution B has reviewed Institution A, one has to imagine a sort of daisy chain of kindness: A will be kind to B in the hope that B will be kind to C, and C will be kind to D who in turn will be kind to A. Possible, but not very likely. Accrediting commissions guard against direct conflicts by rules including, for example, a prohibition against visitors to an institution from institutions in the

same state and a prohibition against visitors to an institution with which they have had any prior connection.

In fact, the risk of conflict of interest lies much more in bias against an institution, or a tendency to be harsh, than in favorable bias, because academia is a fiercely competitive world. Faculty and staff participate in accreditation reviews hoping to learn from other institutions, but not hoping to find the institutions generally better than their own.

Alternatively, some critics assume bias not on the part of reviewers or visitors but on the part of the commissions that make the decisions, because the majority of commissioners are employed by institutions of higher education. Were accreditation another name for regulation, this criticism would be valid: regulators should not see the regulated enterprise from the point of view of the practitioners in their charge. But accreditation, except as viewed by the US Department of Education (more on that later), is not regulation: it is a professional endeavor to define, assure, and improve quality through shared standards set by association. Commissions made up largely of people who understand their enterprise deeply and have an interest in its well-being and good repute are the most likely to yield judgments that are well founded, based in reality, and conducive to quality improvement.

There is also a sense among some critics that peer review leaves higher education stuck in the status quo. When the US Department of Education announced its Educational Quality through Innovative Partnerships program (EQUIP), the *Wall Street Journal* quoted undersecretary Ted Mitchell as saying that the "peer-review system has allowed colleges to become complacent in shaping curricula to keep up with technological advances."[12] The charge of complacency is without foundation. First, the kinds of programs for which these funds will be made available—programs such as training to operate high-tech manufacturing equipment—are not appropriate to many institutions. Second, for the many colleges that do offer such training, mostly community and technical colleges, the statement is grossly unfair and untrue: hundreds of community colleges work very closely with local industry to meet needs for training.

In fact, the greatest hindrance to programs of the sort the department is now supporting has been the department itself. These are programs that will be taught by unaccredited providers in partnership with an accredited institution. Such partnerships have long existed, but they have been hampered, sometimes strangled, by the department's prohibition against student aid funding for any program at an accredited institution in which more than 50 percent of the program is provided by a nonaccredited partner. What the department did with EQUIP was to

waive that prohibition for a select group of "experimental" programs. The solution to the "complacency" of colleges allegedly brought on by peer-review accreditation turns out to be waiving an arbitrary requirement made by the Department of Education.

There are side benefits, too, to the peer-review system. Because peer reviewers do much of the work, accrediting commissions manage with small staffs and large numbers of volunteers. Because the volunteers are either paid nothing or offered token honoraria, institutional accreditation is cost-effective. In countries where the price is lower to the institutions, the cost is usually higher and may be borne in whole or large part by the government.

As a significant by-product, the peer-review system also provides its participants superior opportunities for professional development. Faculty and staff members from across the institutional spectrum participate sometimes for recognition but almost always as service to the profession and for the opportunities to learn. Most higher education associations are formed by various sectors, such as liberal arts colleges, religious institutions, advanced research universities, community colleges, private nonprofit institutions, public institutions, and so forth. Accreditation associations are almost the only ones to bring together all these types, so that institutions learn from others across a wide range.

Nongovernmental

In addition to the 50 percent rule discussed previously, there are several requirements imposed by accreditors that are in fact requirements of the Department of Education. Some are requirements with which the accreditors agree and which they would impose without the department's oversight (and often did before the accreditation practice became enshrined as a department rule). Others, most notably the hopeless requirement regarding the relationship between contact hours and credit awarded, were imposed by the department against the protest of accreditors. The Department of Education suffers all the constraints of a governmental bureaucracy attempting from its seat in Washington, DC, to impose a fair set of rules on a vast and highly diverse enterprise. The ability of regional accreditation to permit the healthy and indeed powerful diversity of institutions the United States enjoys depends not only on the commissions' regard for diversity of mission but on their being nongovernmental bodies.

Additionally, the status of accrediting commissions as nongovernmental entities to some degree limits political interference. The commissions are not answerable

directly to the federal government and even less to any state or local authority. (Technically, the federal government cannot close down an accreditor; it can only withdraw recognition of the accreditor as a gatekeeper for federal student aid funds, an action that may lead to the collapse of an accreditor but also may not. The regional accreditors were in business for a good 50 years before accreditation was placed in that gatekeeping position.) This independence creates some insulation against shifting political winds and thus contributes to the protection of academic freedom. The accreditors listen to concerns or complaints from elected officials but view them as representatives of the public, not as overseers.

Occasionally, an accreditor's independence may also protect institutions more directly. When legislation was proposed in Indiana that would have moved approval of faculty qualifications in dual-credit programs (taught at a high school but given credit by a college) solely to the high school, the universities turned to their accreditor for support. When the State of North Dakota was contemplating the elimination of a board to oversee its universities, concerned parties turned to their accreditor. In both instances, the accreditor was careful to avoid a partisan position but did inform the process with letters describing the relevant accreditation expectations.

Nongovernmental status also means that institutions—and anyone who feels aggrieved—can sue the commissions. One consequence is to make the commissions very careful with regard to articulating strong foundations for their actions and providing due process. This is an advantage for institutions but also a safeguard for the public.

When It Does Not Work So Well

Accreditation, as developed by the regional associations of the United States, is good for the higher education enterprise it monitors. It fosters a culture and practice of continuous improvement. It requires institutions to attend to the quality of their work as an ongoing matter. Its peer-review system assures currency and an informed connection to the field, keeps costs low, and offers opportunities for faculty and staff to learn from others. Its attention to institutional mission and its flexibility allow for a great diversity of institutions, meeting a wide array of needs. Its independence, as a group of nonprofit associations, further supports the diversity of institutions and shields its processes from political interference.

But it does not always work quite that way: execution is rarely quite as good as the plan.

A self-study done well not only presents the institution in a good light but also candidly addresses its shortcomings. That candor is under pressure. For a long time, the self-studies of most public institutions have been publicly available, but they were never popular reading. Increasing demand for transparency has led the commissions gradually to make all self-studies public and readily available. Transparency is generally a good thing, in accreditation as in other enterprises, but making a document of this sort public works against candor because it makes institutions more concerned for image.

A volunteer corps will never be as thoroughly trained as a staff, and every so often someone will make a mess. For example, the assessment movement has in places developed one of the less attractive characteristics of a movement: doctrinaire practitioners rigidly adhering to a specific set of practices who attempt to judge the practices of an institution by the particulars of their chosen dogma. A volunteer corps is also less easily managed: it is sometimes difficult to herd volunteers to deadlines or other protocols, and sometimes the exigencies of life, like births and deaths, interfere with schedules for timely reporting.

The use of accreditation to enforce various interests on the part of the US Department of Education and even Congress has created an uneasy mixture in which regulatory requirements and postures undermine the ethos of peer review. The department prefers numerical indicators that can be checked mechanically; peer review tends to the application of professional judgment.[13]

When accreditation first became a requirement for institutions to receive federal student aid funds, it was entirely a nongovernmental process, and in fact, that was just the point: Congress did not wish to create a government bureaucracy to certify institutions. Eventually, the process of governmental approval of various accreditors for this gatekeeping function proved an opportunity too good to resist, a way for the Department of Education to impose regulations on institutions without having to monitor them directly. The accreditors monitor the institutions, and the department monitors the accreditors. Institutions' perception of accreditors has therefore moved from a group of peers providing helpful critique to a group of functionaries enforcing rules. It has become necessary for accreditors occasionally to remind their institutions that "we are you." And we are not quite. What exists today is an uneasy and possibly unstable amalgam of bona fide accreditation and governmental regulation.

The perception of the accreditor as "other" occasionally tempts an institution to use accreditation as an excuse for things it cannot defend successfully to its

faculty. Accreditors expect that institutions will articulate learning goals for their programs. Accreditors also require that program and course requirements be explained clearly to students. At some institutions, those two together have turned into a requirement that faculty list learning goals on their syllabi, and recalcitrant faculty will be told that this is an accreditation requirement. It is not, and saying that it is helps no one.[14]

Somewhat similarly, both accreditation and assessment are abused when the latter is treated as merely an accountability exercise required by the accreditor. An institution that fails to engage genuinely in assessment of student learning creates pointless labor for its faculty, alienating faculty from the concept itself. When that happens, the effort is doomed, because it succeeds only when faculty learn from the assessment so that they can adapt their pedagogy or requirements. Making assessment of student learning as valuable, and simple, as it can and should be has been perhaps the greatest challenge for accreditation as it puts theory into practice.

The ever-increasing importance of federal student aid to institutions' ability to function has also warped accreditation. With too much at stake to do otherwise, institutions sanctioned by their accreditor have taken to the courts, leading over time to unhealthy caution on the part of accreditors. Perhaps more insidiously, institutions both public and private have sought, with occasional success, to bring political pressure to bear on accreditor actions.

Coda

Even with its present flaws and foibles, regional accreditation, holding firm to a concept of colleges and universities as sites of education rather than production and consumption, offers much that regulatory agencies do not. Above all, it guides institutions to a posture of continuous improvement and to assurance of their own quality, the only assurance that works for real quality in higher education.

Whether it can continue to fill that role is not clear. Although the history of its evolution in recent decades has been one of increasing responsiveness to the challenges faced by contemporary higher education, among them student learning, student outcomes, and institutional integrity, that evolution has also been one of increasing governmental control of the process and its values. With every increment in that control, the government's understanding of quality in higher education edges out the broader conception of quality that guides accreditation.

In a recent essay in *Inside Higher Ed*, Judith Eaton aptly states the concept of quality that drives the US Department of Education, a concept that finds general

agreement on both sides of the congressional aisle: "From a federal perspective, 'quality' is now about higher graduation rates, less student debt and default, better jobs, and decent earnings." The problem is not that these things are part of the federal understanding of quality in higher education; it is that they are its only part. Occasional nods to education itself are patently window dressing. Eaton summarizes where we may expect expanding federal authority to drive accreditation: "federally imposed student achievement standards, a federal definition of quality, federal design of how accreditation is to operate and federal requirements that accrediting organizations include considerations of debt, default, affordability and success with Pell Grants as part of their standards."[15]

If and when this federalization is accomplished, it is doubtful that accreditation's historic role will persist in any meaningful way. Eaton concluded her essay with a plea for "balance" among higher education, accreditation, and the government. Yet, eleven days after the essay was published, the Department of Education issued a press release touting its various steps to manage accreditation and focus it on the outcomes Eaton notes, and suggesting its unhappiness with the one area in which Congress has explicitly truncated its authority ("Under current law, the Department is barred from establishing any criteria for agency standards of student achievement.")[16] It is possible that were the department to achieve authority to establish criteria for student achievement, it would limit its interest to graduation rates, student debt, loan default rates, and employment outcomes, leaving academic standards alone. It is also possible that it would not. In that event, the loss would be not to accreditors, but to US higher education and its institutions. With the federal government purportedly attending to academic standards, accreditation would likely wither away, given what would surely be perceived as duplicative costs in time and effort. Higher education would become more liable to definitions that confuse education with a set of outcomes such as employment and loan default rates. It would be increasingly subject to the inevitable rigidities, political agendas, and reductionism inherent in governmental bureaucracies. We would lose the mechanism whereby higher education can be assured attention to a meaningful concept of quality; whereby it has been possible to accommodate the ever more immense range of the enterprise without distorting it through simplistic measures; whereby a dynamic and adaptive expectation for improvement has prevailed over regulatory notions of fixed quality; and whereby the only entity capable of true quality assurance, the institution itself, has been empowered to conduct such assurance and held accountable for it.

NOTES

1. "2016 Standards for Accreditation, Preamble," *Commission on Institutions of Higher Education*, accessed August 1, 2016, https://cihe.neasc.org/.

2. "The Changing Context for Accreditation," *Western Association of Schools and Colleges Senior College and University Commission*, accessed August 1, 2016, https://www.wascsenior.org/resources/handbook-accreditation-2013/part-i-2013-handbook-and-wasc-accreditation/changing-context-accreditation.

3. "Criterion 1.D," *Higher Learning Commission*, accessed August 1, 2016, http://www.hlcommission.org/criteria.

4. "The institution has developed an acceptable Quality Enhancement Plan that includes an institutional process for identifying key issues emerging from institutional assessment and focuses on learning outcomes and/or the environment supporting student learning and accomplishing the mission of the institution." "2012 Principles of Accreditation," *Southern Association of Colleges and Schools Commission on Colleges*, accessed August 1, 2016, www.sacscoc.org.

5. AQIP is the acronym for Academic Quality Improvement Program. "Accreditation," *Higher Learning Commission*, accessed August 1, 2016, www.hlcommission.org.

6. "2016 Standards for Accreditation, Preamble."

7. See, for example, the specification of graduation and default rates that will be reviewed in the recent announcement by the Council of Regional Accrediting Commissions ("Regional Accreditors Announce Expanded Review of Institutions with Low Graduation Rates," *Council of Regional Accrediting Commissions,* press release, September 21, 2016).

8. "The European Higher Education Area and the Bologna Process," *European University Association*, accessed August 1, 2016, www.eua.be/policy-representation/higher-education-policies.

9. "Realising the European Higher Education Area," *Communiqué of the Conference of Ministers Responsible for Higher Education in Berlin* (2003): 3.

10. US literature around accreditation, as well as the documents of some of the accreditors, speaks of "self-regulation." Self-regulation, however, is a narrower concept more focused these days on preventing governmental regulation than assuring quality. See Peter Ewell, *US Accreditation and the Future of Quality Assurance* (Washington, DC: Council for Higher Education Accreditation, 2008), 69.

11. No one, of course, can assure that absolutely, and so the accreditors place requirements on programs or institutions being phased out or closed.

12. "Students to Get Aid for Alternative Training," *Wall Street Journal*, August 17, 2016, A2.

13. See, for example, "Letter to Accreditors," US Department of Education, April 22, 2016, 5: "Regional accreditors tend to use qualitative measures of student achievement, and tend not to have numerical metrics. We encourage them to consider adding objective, transparent, comparable, and actionable quantitative measures." www.ed.gov/accreditation?src=accred.

14. See, for example, the article "Should a Professor Lose His Job over Refusing to Put Learning Outcome on His Course Syllabus?" *Inside Higher Ed*, August 8, 2016. This

example has gone public, but it is not unique. Notice the accreditor's careful response, caught between not wanting to support an excessive requirement and not wanting to imply criticism of the underlying fundamentals of learning outcomes and clarity.

15. Judith S. Eaton, "Growing Federal Role in Accreditation Will Have Drawbacks," *Inside Higher Ed*, December 1, 2016.

16. "Press Releases," *US Department of Education*, accessed December 16, 2016, www.ed.gov/news/press-releases/education-department-establishes-enhanced-federal-aid-participation-requirements-acics-acc.

Change in Higher Education Accreditation

The Perspective of a National Accreditor

Leah K. Matthews

A different approach to institutional accreditation comes from the national accrediting agencies. Developed in response to the quality assurance and improvement needs beyond specific geographic boundaries, national accreditation oversees the quality improvement and assurance for institutions independent of regional location.

Inadequate educational achievement rates, soaring tuition prices, unsustainable levels of student debt—it is not surprising that the growing prominence of concerns regarding the status of higher education in the United States has caused demands for greater accountability in the performance of institutions of higher education. Consider, for example, the *Education at a Glance 2016* report released by the Organisation for Economic Co-operation and Development (OECD) that ranked the United States 12th among the 44 OECD and partner countries in the percentage of 25- to 34-year-olds who have completed a college degree.[1] Such a ranking demands explanation, particularly given the costs to taxpayers and students. For the 2016 fiscal year alone, more than $120 billion in federal financial aid was available for students to attend nearly 6,000 accredited postsecondary institutions.[2] Federal regulators have responded with heightened scrutiny of accreditors and have introduced new reporting and performance requirements for institutions, with a particular focus on student graduation rates, cohort default rates, and, most recently, gainful employment metrics for career training programs.[3] National, regional, and specialized accreditors have found themselves

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on the defensive as they strive to maintain meaningful evaluation and oversight of educational institutions and programs while also accommodating an ever-expanding diversity in educational models, student populations, institutional missions, vocational and professional requirements, and technologies.

To be clear, the heightened concerns expressed by the public and by governmental regulators are justifiable. An important question, however, is whether additional data collection and reporting requirements combined with an aggressive application of consumer protection law effectively addresses these concerns. Rather, perhaps what is called for is a larger, more integrated reconception of the broader accreditation system that supports expansion of educational opportunity and innovation while maintaining the integrity of educational offerings and improved student outcomes.

This chapter considers these signals from the perspective of a national accrediting association. It begins with a brief review of the evolving history of accrediting organizations in the United States, the expansion of postsecondary institutions and diversity in their respective missions and educational models, data collection and reporting required by the federal government, and the ongoing impact of technology on teaching and learning. It then offers some thoughts on what is working well within the accreditation system and what aspects could be retained either in their current form or in a modified form, and how higher education might, on a national level, reimagine the accreditation system to ensure an educational infrastructure that supports innovation, research, personal growth, the advancement of knowledge, job readiness, and career development. The chapter concludes with a discussion of the accelerating trend to nationalize accreditation standards in response to federal involvement and funding oversight, the increasing mobility of students, and the continuing introduction of new technologies and innovations.

The Evolving History of Accreditation of Postsecondary Institutions

Concerns about how to maintain the quality and effectiveness of postsecondary educational institutions date back to the beginning of the last century and reflect a multitude of interests whether public and private, regional and national, or vocational and professional. The organizations that eventually became the regional accreditors originated in the early 1900s.[4] At that time, geographic proximity largely determined the operational area for organizing assessment activities and regional orientations factored into institutional curricula. Accordingly, the

accreditation practices established by these institutions were themselves regional in nature. Accreditation standards and procedures developed and matured within defined regional boundaries.[5]

The premise behind the concept of regional boundaries in higher education accreditation, while valued for its foundational origins, is becoming less relevant. Most institutions that make up the higher education system in the United States currently draw students as well as faculty on a national and international basis. Institutions have physical campuses located across the United States as well as internationally. Furthermore, distance education programs made possible by technological advances are contributing to an increasingly decentralized higher education system in the United States. Finally, federal tuition assistance programs involve successive layers of federal regulation and oversight that are applied on a national rather than on a state or regional basis. As a result, although the current regional accreditors are the heirs to geographical boundaries established for traditional institutional accreditation, educational institutions are not ultimately limited to seeking accreditation from their regional accrediting agency. Institutions can relocate a main campus to a preferred regional accreditor or seek national accreditation. Innovative ventures in quality assessment and improvement are being designed for implementation on a national scale, such as the Council for Higher Education Accreditation (CHEA) Quality Platform,[6] Quality Matters,[7] and the American National Standards Institute.[8]

In parallel with the development of the regional accrediting agencies for colleges and universities, national organizations were formed to address concerns about education quality and student performance across a broad spectrum. National professional accreditation groups in disciplines such as law, veterinary medicine, microbiology, and civil engineering formed as early as 1905 in response to concerns about uneven quality of professional education providers.[9] Following the same pattern of national structure, when the country's original array of liberal arts colleges—founded primarily to prepare preachers—discontinued their denominational affiliations and broadened their mission, independent theological schools emerged and nationally organized associations such as the Association of Theological Schools in the United States and Canada created accreditation standards and procedures specific to theological education.[10] A national structure of accreditation also emerged as early as 1912 as privately owned vocational and career schools materialized to fill a training gap that traditional higher education institutions did not address.[11] To that end, formal standards were implemented

and practiced by career and technical school accreditors.[12] Finally, the field of correspondence education, while valued for providing educational programs to underserved populations, was also drawing criticism for the absence of effective oversight of education quality in correspondence courses. In response, a national organization formed in 1926 that took responsibility for setting program requirements and implementing other quality control measures for correspondence schools.[13]

National accreditation functions with objectives that are in many ways consistent with regional accreditation. First, national accreditors perform a comprehensive evaluation of an institution's programs, student achievement, and financial stability. In connection with this objective, national accreditors examine and evaluate (1) comprehensive documentation provided by the institution relating to each of the agency's written standards of accreditation; (2) peer-review findings relating to the learning outcomes, curricula, content delivery, faculty, academic resources, and leadership of the institution, the results of which are compiled into a comprehensive report; and (3) information from third parties, including students, the public, and state and federal government entities. National accreditors that implement standards for the accreditation of institutions offering career and technical programs focus intently on the collection and analysis of student achievement data for every program to include data on graduate job placement rates. The second objective of national accrediting agencies is the implementation of standards that support continuous self-evaluation and self-improvement. This objective is supported not only through the exchange of information and feedback that occurs during the primary accreditation evaluation process but also in connection with the annual reporting and interim communications that continue between formal cycles of accreditation review. Typically, national accrediting organizations review institutions for the renewal of accreditation every five years. The value of peer review and continuous improvement in combination with robust assessment of compliance with standards supports the key objectives of national accreditation.

Challenges for Accreditation: Federal Oversight

Significant among the challenges for accreditation is the increasing involvement of the federal government in accreditation (see chapter 1, Phillips and Kinser). With this rising engagement, there has been increased scrutiny of accreditors, including the US Department of Education publishing accreditor stan-

dards for student achievement and a broad range of institutional data such as graduation rates, default rates, median debt data, postgraduation earnings, and enhanced cash monitoring metrics attributed to each accreditor. In addition, the Department of Education itself established the online College Affordability and Transparency Center,[14] the College Scorecard,[15] and implemented Accreditor Dashboards[16] to provide information on institutions centered on numeric data points that students and families can use to evaluate the price, quality, and value offered by different institutions. While the objectives of the data and reporting requirements in terms of increasing transparency and enhancing consumer protections are understandable, concerns have begun growing within the accreditation community that the signature features of accreditation—peer review and quality improvement—were being supplanted rather than supported by data. The new approach by regulators seemed to evaluate educational programs as consumer products rather than as the blend of teaching, learning, mutual engagement, research, experimentation, and practica that education represents. The federal government's requirement that accrediting agencies take a more aggressive stance as gatekeepers of federal funds while continuing to provide the critical services of assuring education quality and institutional improvement in itself poses a challenge to the accrediting community.

Challenges for Accreditation: Educational Models and Technology

In addition to the challenges posed by the evolving federal engagement, accreditors have faced additional challenges from the emergence and then proliferation of new and varied educational providers. For example, with the expansion of distance education has come emerging practices including offering stand-alone degree/certificate programs on a purely remote basis, or in hybrid forms combining both classroom and distance learning models. Online learning is offered alongside traditional classroom courses by brick and mortar schools, or as the sole option of purely online schools. Initial skepticism about distance education has continued to abate in the face of technological advances that support advanced communications, complex curricula and research, sophisticated pedagogical techniques, and flexible learning models. In fact, it would be difficult today to find an institution of higher education that does not incorporate at least some remote learning functionality in its educational process. As a national accreditor of distance learning institutions, the Distance Education Accreditation Council (DEAC) has had the opportunity to usher innovators in online education onto the national and global

stage. For example, the University of the People (UoPeople) was established to provide universal access to college studies, despite geographic and economic constraints, based on the principles of e-learning and peer-to-peer teaching, coupled with open-source technology and courseware. After receiving DEAC accreditation, UoPeople established partnerships with New York University and the University of California, Berkeley, which in turn offered opportunities to UoPeople's best students to enroll in these highly regarded universities.

For accreditors, the challenge has been to support and facilitate technological innovations designed to enrich and enhance the student learning experience while at the same time ensuring that the implementation of new technology does not detract from or impede the quality of the educational process or negatively affect student outcomes. For example, adaptive learning is one such rapidly evolving technology that is gaining more prominence. It is an educational method that uses technology-based interactive teaching to orchestrate the allocation of human and mediated resources according to the unique needs of each learner.[17] Computers adapt the presentation of educational material according to students' learning needs, as indicated by their responses to questions, tasks, and experiences; the underlying technology encompasses findings from various fields of study including computer science, education, psychology, and brain science.[18] The goal of adaptive learning technology is to transform the learner from a passive receptor of information to an active collaborator in the educational process. But the technology is neither mature nor designed as an out-of-the-box, one-size-fits-all educational tool. So when American Sentinel University, a DEAC-accredited institution, made a commitment to develop an adaptive learning strategy to support its Master's in Business Administration for Healthcare, the institution worked with DEAC to ensure that appropriate resources were aligned with the learning activities to support educational effectiveness. For example, among the questions DEAC asked the university to answer were:

- How were faculty trained to implement the model?
- How do faculty initiate regular and substantive assessment of student learning?
- How does the institution monitor student engagement and assure regular and substantive interactions between student and faculty are taking place?
- Does the institution possess the resources needed to sustain the technology and support users?

- How does the institution authenticate the identity of students?
- Is the system secure and does it protect student privacy?
- Does the university have an effective means to review and evaluate student outcomes?

In short, accreditors are increasingly being called upon to develop or adapt procedures in order to validate the legitimacy of the technologies that are being implemented in the name of supporting student learning and outcomes.

In addition to the expansion of educational programs and providers resulting from advances in technology, accreditors have also seen an expansion in the number of career-focused, competency-based boot camps offering short-term certificate programs in fields such as software coding, emergency medical services, and web development. These noninstitutional educational providers have not only presented new challenges for how they fit into the broader structure of meaningful accreditation evaluations but have also pushed to the forefront the complex array of business community demands and expectations that apply with equal measure to these training activities and with which accreditation standards can dovetail, conflict, or simply coexist.

New Directions for National Accreditation

As referenced previously, a number of forces are pushing toward national approaches to quality review and the potential obsolescence of regional geographical boundaries in the accreditation process. The federal requirements governing educational funding and tuition assistance, the geographic mobility of students and faculty, the rapid expansion in the number of institutions offering programs beyond regional boundaries, the introduction of new technology being adopted by institutions nationwide, and the globalization of job opportunities are only a few examples of these forces. But this does reflect demand for stronger coordination across accreditors of higher education on a national level. This is becoming more obvious and more compelling.

In fact, the trend toward national evaluation and accreditation standards has already taken its first steps and is picking up speed. Consider, for example, the Department of Education's Educational Quality through Innovative Partnerships program (EQUIP) to provide low-income students with access to new models of education and training.[19] Quality assurance entities such as Tyton Partners,[20] Quality Matters,[21] and Entangled Solutions[22] already offer national solutions to track the performance of individual programs in areas such as setting and

monitoring outcomes-based standards, evaluating claims of student learning, assessing student work, collecting data on earnings growth, monitoring student satisfaction, and independent auditing to verify outcomes data. Additional new national frameworks for collecting and reporting data, such as Lumina's Credential Engine[23] and Measure One's Risk Adjusted Margin Dashboard,[24] have also emerged and more are undoubtedly on the way.

Responding to calls for accountability of programs that promise to prepare students for specific careers, one national career school accreditor, the Accrediting Commission of Career Schools and Colleges (ACCSC), has implemented data collection and analysis procedures used by policymakers and regulators to evaluate institution quality for career and technical programs. For example, the ACCSC model requires its institutions to track multiple cohorts of students within each program and demonstrate that students graduate within 150 percent of the program length at a graduation rate benchmark set by the accreditor, obtain employment that is clearly related to the stated educational outcomes for the relevant program within three months following their graduation, and document that an independent auditing firm examines a sample of the data to verify the accuracy of the employment rate.[25]

Independent of national standards imposed by the federal government, the rapid proliferation of technology-enabled education solutions and models supports the need for national collaboration among accreditors in developing evaluation standards and techniques that can effectively and comprehensively validate the new tools and systems and limit the risk that insufficient planning, implementation, and adoption could negatively impact student learning. Students need the skills and degrees they earn at one institution to be recognized by another as well as by prospective employers located across the country. The business community, in turn, needs assurance that institutions will graduate students with comparable baseline skill sets and competencies.

National engagement on distance education quality has resulted in enhanced opportunities and protections for students, most recently in the establishment of the State Authorization Reciprocity Agreement (SARA) among member states and territories. SARA establishes a comparable national framework for interstate offering of postsecondary distance education courses and programs. It is intended to make it easier for students to take online courses offered by postsecondary institutions based in another state, strengthen the process of resolving complaints, and reduce a rapidly growing institutional cost that is in one way or another passed along to students.[26]

Two Significant New Challenges for Accreditation: Data and Dual Roles

The array of challenges offered by the changing educational landscape offer tremendous opportunities for growth and innovation. Two significant new challenges are of particular note and merit specific focus. First, data banks ranging from those of the federal government to those of the accreditor and the institution provide enormous opportunities to collect, analyze, and publish vast quantities of data relative to student performance and institutional effectiveness. However, in an increasingly data-focused environment, accreditors and their institutions, and governments and the public, must utilize data effectively and appropriately when evaluating educational quality. There are many dimensions to the delivery of education quality. Factors such as varied learning models, diversity of educational missions, open admissions practices, student mobility, effectiveness of educational platforms, quality of communications between and among students and faculty, nonacademic activities, research and fieldwork requirements, and the nontraditional profile of many students, particularly those enrolled in distance learning institutions, simply cannot be fully assessed through existing data models, and yet they are critical to the student learning that represents the core of the educational mission. The fundamentals of accreditation that feature extended peer-to-peer conversations during on-site visits, highly individualized assessments, observations of student practica, and collaborative initiatives must be considered carefully in conjunction with information provided through numeric values. Higher education accreditors and institutions alike, as well as government overseers, cannot be satisfied with data collection that cannot be used or is not used to improve upon student learning. Rather, information gathered through the accreditation process must be embraced and used intentionally for teaching, curriculum development, and institutional assessment. Meaningful evaluation of the effectiveness of the United States' current accreditation system for higher education cannot look solely to the statistics on institutions or programs reported by accreditors for use on government dashboards but must also take into consideration each accreditor's effectiveness in identifying the shortcomings of an institution and its efforts to support the institution's goal of continuous self-improvement.

The second new challenge for accreditors afforded by the changing educational landscape is that of managing the dual roles of improvement and gatekeeping. DEAC implements a process that can serve as an example of one way in which

accreditors can safeguard the integrity of the accreditation process while at the same time satisfy the requirements of the federal government to serve as a gatekeeper for federal student aid programs authorized under Title IV of the Higher Education Act. More specifically, DEAC has deliberately separated the evaluation of an institution for Title IV eligibility from the evaluation of the institution for accreditation purposes: only after an institution has been accredited will DEAC review its readiness to participate in federal financial aid programs. At that point, the institution prepares an additional self-study document and undergoes an evaluation by a team that assesses the institution's readiness to comply with applicable federal financial aid program regulations, including those governing the implementation and documentation of regular and substantive interaction policies, disclosures of information to prospective students regarding financial aid eligibility, Title IV refund policies, and qualifications of financial aid administrators at the institution. This separation of the traditional accreditor functions of evaluating institutional quality and supporting the ongoing improvement of institutions from the accreditor's federal gatekeeping responsibilities preserves the critical role played by peer review and the more in-depth, nonnumeric evaluation process used to assess educational quality and student learning opportunities and outcomes. The model also permits institutions to be more deliberate in making a choice when considering the additional reporting and compliance regulations associated with Title IV programs. For example, UoPeople wanted the quality assurance benefits of accreditation, but its mission as well as unique aspects of its academic and business model did not align with Title IV participation. DEAC procedures allowed the institution to receive accreditation without involving it in irrelevant federal requirements. The absence of scrutiny related to Title IV participation, however, must not diminish rigorous oversight of institutions. Accredited institutions must adhere to standards intended to assist students in meeting their educational needs and goals, including providing educational and student support services; demonstrating effective leadership through qualified and experienced administrators, faculty, and staff; and monitoring student achievement and satisfaction.

Recommendations

If the US system of higher education accreditation is to remain effective, it must find a way to uphold the distinctive qualities of multiple educational models and diverse types of institutions. This is likely to require changes to the current system of accreditation. First, the accreditation community should collaborate to

develop consistent practices for transparency, terminology, and student achievement assessment to be implemented across accrediting organizations. Second, the distinction between regional and national accreditors should evolve into groupings that would better serve institution mission (e.g., community colleges, Research I universities, career and technical training institutes, private liberal arts colleges). Accreditation standards could be developed and adopted for different categories of institutions and programs with an emphasis on ensuring that each institution delivers on its stated mission. Third, the potential for collaboration on the development of new accreditation and validation processes (including with respect to new technology and learning models) as well as opportunities to extend reciprocity agreements, where appropriate, should be explored and implemented when practicable and advisable. Fourth, while recognizing the capabilities of data analytics to provide insights into institutional performance, accrediting agencies should work together, in an intentional and organized way, to ensure that the primary focus of accreditation remains institutional excellence and the ongoing institutional improvement of student learning and educational quality. Finally, accrediting agencies will need to address the ways in which accreditation can effectively perform the dual functions of quality improvement and federal gatekeeping.

NOTES

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2. United States Senate Health, Education, Labor and Pensions Committee, *Risk Sharing / Skin in the Game* (Washington, DC: United States Senate, 2015).

3. "Education Department Releases New Graduate Earnings Data for Career College Programs," *US Department of Education*, November 23, 2016, https://www.ed.gov/news/press-releases/education-department-releases-new-graduate-earnings-data-career-college-programs.

4. Peter Ewell, *US Accreditation and the Future of Quality Assurance* (Washington, DC: Council for Higher Education Accreditation, 2008), 21.

5. Regional accrediting agencies currently recognized by the US Department of Education include the Middle States Commission on Higher Education; the New England Association of Schools and Colleges, Commission on Institutions of Higher Education; the North Central Association of Colleges and Schools, the Higher Learning Commission; the Northwest Commission on Colleges and Universities; the Southern Association of Colleges and Schools, Commission on Colleges; and the Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges.

6. See "The Quality Platform: External Review of Alternative Providers of Higher Education," *Council for Higher Education Accreditation*, July 2015, http://www.chea.org/userfiles/uploads/Quality%20Platform%20-%20Summary%20Doc.pdf.

7. See the website for Quality Matters: https://www.qualitymatters.org/.

8. See the website for ANSI: https://www.ansi.org/.

9. Ewell, *US Accreditation and the Future of Quality Assurance*, 24.

10. Harold Orlans, *Private Education and Public Eligibility* (Lexington, MA: D. C. Heath and Company, 1975), 67.

11. Ewell, *US Accreditation and the Future of Quality Assurance*, 26.

12. National career and technical school accreditors currently recognized by the US Department of Education include the Accrediting Commission of Career Schools and Colleges, the Accrediting Council for Continuing Education and Training, the Council on Education, the Accrediting Bureau of Health Education Schools, and the National Accrediting Commission for Career Arts and Sciences.

13. This organization evolved over time into DEAC and is currently recognized by the US Department of Education and CHEA.

14. "College Affordability and Transparency Center," *US Department of Education*, accessed January 1, 2017, https://collegecost.ed.gov/catc/.

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16. National Advisory Committee on Institutional Quality and Integrity, "Recognized Institutional Accreditors: Federal Postsecondary Education and Student Aid Data," *US Department of Education*, accessed January 1, 2017, https://www2.ed.gov/admins/finaid/accred/accreditor-dashboards.pdf.

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22. See the "About Us" page on the Entangled Solutions website: https://entangled.solutions/about.

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The Evolving Context of Quality Assurance

A Perspective from Specialized and Professional Accreditation

Joseph Vibert

The third approach to accreditation is detailed here from the perspective of specialty and professional accreditors. Given their focus on individual programs and disciplines, this segment of the accreditation community faces different pressures than the national and regional accreditation agencies.

Specialized and professional[1] accreditors play a distinct role in serving the public interest. By assuring educational quality in higher education programs across diverse professions and fields of study, they ensure that there are competent and safe entry-level practitioners in all sectors to provide services to the public. These professions range from architecture to veterinary medicine, engineering to respiratory care, and art and design to project management. In all, about 100 specialized and professional accreditation agencies cover roughly 3,000 institutions of higher education across more than 23,000 different programs.[2] Programmatic accreditation differs from other forms of quality assurance and faces pressures both from within and external to their disciplines. This chapter provides an overview of how programmatic accreditors work, discusses the pressures, and offers some potential improvements for the current system.

Programmatic Accreditation Is Different from Institutional Accreditation

Specialized and professional accreditors review programs, departments, or schools that are typically within a larger college or university. Those colleges or

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universities are subject to *institutional* accreditation, in which regional or national accreditors review an entire college or university to assure that each of the institution's parts is contributing to the achievement of the institution's mission and objectives. In contrast, in programmatic accreditation the unit accredited may be a college or school within a university (e.g., a school of pharmacy) or a specialty within a discipline (e.g., applied science, computing, engineering, and engineering technology within the broader field of engineering). Most specialized and professional accreditors focus on a unit within an institution of higher education that is accredited by one of the regional or national accreditors. As ever the case, there are exceptions to the rule, and some programmatic accreditors also review specialized institutions of higher education that are freestanding and single purpose in their operations. In these instances, a programmatic accreditor may also serve as an institutional accreditor. Some of these "institutions" are in nontraditional educational settings, such as hospitals.

Both institutional and programmatic accreditation involve similar elements in the review process: the program or institution formally invites an accreditor to conduct a review; the program conducts an internal review and prepares a self-study report based on accreditation standards to assess effectiveness, strengths, and areas for potential improvement; the accreditor performs an external review involving peer reviewers from outside the program who analyze the self-study report and conduct an on-site review to validate information in the self-study report; findings from the internal and external reviews are presented by the peer reviewers to the accreditor's decision-making body; and the decision-making body makes the accreditation decision based on the findings and any additional comments from the program or institution. Following the granting of accreditation, the program or institution is monitored periodically, and the cycle repeats when the term of accreditation ends.

Quality improvement is also an important role for both forms of accreditation. In the case of specialized and professional accreditors, however, there is a significant emphasis on interactions with the relevant practice community and employers to ensure that educational standards keep pace with changes and innovations in their fields and to bring academic programs up to those standards.

The two kinds of accreditation also differ in the focus of their quality assurance review. Specialized and professional accreditors zone in on discipline-specific quality assurance, such as measures of student learning or competence that are essential to the profession. Specialized accreditation reviews ensure that the program has appropriate content, qualified faculty, and adequate resources to meet

profession-specific accreditation standards. In contrast, institutional accreditors focus on reviewing academic and organizational structures and systems to determine how the parts of the institution contribute to achievement of institutional objectives and to ensure that it has key structural elements as well as financial and other resources to support its mission. Of course, no accreditor performs reviews in a vacuum: programmatic accreditors must assess programs within the institutional framework where the program resides, and institutional accreditors will do some level of review of programs to ensure that the parts are contributing to the whole. And, there is the possibility that an institution may meet institutional quality requirements overall, with some poorer performing programs, and conversely, individual programs in an institution may meet and exceed appropriate quality requirements, while the institution as a whole may not.

Professional Judgment, Subject Matter Expertise, and External Perceptions

A key feature of programmatic accreditation is the peer-review process, wherein experts in the given profession contribute to setting national accreditation standards and determining necessary competencies. The identification of competencies for any given profession, as well as the establishment of the accreditation process, is determined and guided by the accreditor, practitioners, employers and industry, educators, professional associations, and other communities of interest. Once competencies are defined by the profession, accreditors focus on assessment methods that enable faculty and other stakeholders to judge whether the student has reached a level of performance that qualifies as competent to enter the profession.[3] Competencies are the knowledge, skills, and abilities/attitudes necessary for safe and effective practice. These include profession-specific competencies as well as critical thinking skills and the ability to grow, to adapt, and to create knowledge that is essential for the evolution of professional practice in response to a changing environment.

While peer review is an essential element in judging such competency outcomes, the peer-review process has been criticized in some policy circles. For instance, a policy paper by Senator Lamar Alexander[4] describes accreditors as "membership organizations."[5] The criticism, in brief, is that by viewing accreditors as membership organizations, the perception is that for a program or institution to gain accredited status, all that is needed is payment of a membership fee, and accreditation reviews will be performed by sympathetic friends and colleagues. This is not the case.

Rather, the reality, strength, and, indeed, necessity of peer review in specialized and professional accreditation is that those who have actual and practical knowledge of the profession contribute across all aspects of the accreditation process, from development of profession-specific competencies and accreditation standards and policies through the review and decision-making about accreditation status. It is this field-specific expertise that determines what quality practice and quality education is and ensures advancement of a profession. Most would agree that the quality standards for the education of a surgeon having been developed and judged by other surgeon experts is far preferable. While there is certainly an important role for consumers and employers to play in the specialized and professional accreditation process, the reliance on professional expertise is critical to effective quality assurance that serves the public interest.

Criticism of the peer-review process can also include concern about the accreditor's organizational structure. Specialized and professional accreditors that are part of a larger association or rely on sponsor support may face the criticism that such relationships interfere with and unduly influence accreditation practice and decision-making. However, as previously noted, the value of relationships between accreditors and stakeholders cannot be overemphasized. These communities of interest and expertise provide relevance and information about current trends and best practices in the field. Far from exerting undue influence, the vast majority of professional associations provide essential and helpful gateways as well as broad access of accreditors to working professionals and employers in the field.

Specialized and professional accreditors vary in size and organizational structure. An accreditor may be a freestanding agency with its own internal structure or it may be a committee or commission within a larger parent organization. Programmatic accreditors may be financially independent or rely on sponsorship from stakeholder associations. The level of resources available can depend on the affluence of the profession: a relatively small accreditor for a well-paid profession may have to rely less on external support than a larger profession that is not well compensated. Direct and in-kind financial support (facilities, staff, technology, administrative services, etc.) from parent organizations and sponsors can be critical, as seeking or maintaining specialized accreditation would be prohibitive if educational programs in increasingly strained higher education resource environments had to fully support accreditation activities through high accreditation fees. Accreditors are cognizant that ultimately these costs would be passed on to students, further escalating the expense of education and student indebtedness.

While the wide array of organizational structures for programmatic accreditors can lead to unfortunate misperceptions, it is the autonomous function of the accreditor that is far more important than the form of any relationship with a parent organization or sponsor. Accreditors should be able to show that they have adequate resources and the ability to determine and manage their own budgets without constraints, regardless of the source of funds. Accreditors should also be able to demonstrate independence in: setting their mission, purpose, functions, and goals; determining the scope of responsibility for decision-making bodies and membership therein; setting accreditation standards and policies and procedures for implementation of accreditation activities; and making accreditation decisions and taking action.

Programmatic accreditors employ a number of ways to demonstrate their functional independence, including: memoranda of understanding with a parent organization or sponsor, established written policy or bylaws that specify the previously identified functions, and conflict of interest policies and processes to address undue stakeholder influence. With these safeguards in place and clearly articulated, specialized and professional accreditors preclude undue influence while ensuring that professional expertise contributes to quality education.

Of note, for accreditors recognized by either the US secretary of education or the nongovernmental Council for Higher Education Accreditation (CHEA), there are recognition requirements regarding the independence of accreditors. In the case of federal recognition,[6] an accreditor must demonstrate that it is "separate and independent" through: the accreditor's decision-making body not being elected or selected by any affiliated trade or membership organization, public representation on the decision-making body, conflict of interest processes, and self-determination of the accreditor's budget. These requirements apply only to those specialized and professional accreditors that serve as institutional accreditors. For CHEA recognition,[7] all recognized accreditors must demonstrate independence from parent or sponsoring entities for the conduct of accreditation activities and have sufficient resources and independent authority to deploy those resources to accomplish their missions.

Specialized and Professional Accreditation Assures Good Outcomes

Over the past decade, the public and policymakers have placed increased scrutiny on accountability in higher education and accreditation. This, in turn, has resulted in additional emphasis on the assessment of student achievement and pro-

gram effectiveness outcomes. Specialized and professional accreditors are uniquely positioned in the outcomes discussion, in that they routinely set and enforce educational standards that protect the public interest by producing safe and competent practitioners in more than 100 professions or fields of study.

A study[8] conducted by the Association of Specialized and Professional Accreditors (ASPA) verified that its member accreditation agencies pay close attention to student learning and program outcomes in the accreditation process, including competency assessment, "bright-line" outcomes requirements, and program-determined indicators.

In this context, *competency assessment* refers to student learning outcomes or student competency attainment. Requirements for competency assessment were reported by 93 percent[9] of the accreditors that provided data for the study. Most specialized and professional accreditors require programs to adopt a set of competencies based on the program mission and to provide a detailed plan for the assessment of those competencies. Some allow programs to tailor competencies within generally accepted norms within the profession, while others mandate programs to assess their students on a very specific set of competencies. It is generally accepted practice that programs must have a system in place to assess effectiveness of teaching through student achievement or demonstration of competencies, and the results of the assessment are used for program improvement. Bright-line outcomes are required by approximately 52 percent of ASPA members. These indicators involve quantitative thresholds that typically relate to graduation or retention rates, placement rates for employment or internships, or licensure exam pass rates for professions with such requirements for entry to practice. Program-determined indicators were used to assess outcomes by 82 percent of the 60 accreditors. These indicators are typically based on the program mission and context within a framework established by the accreditor. Indicators may include graduation and licensure rates, broader inquiries such as student or alumni satisfaction measures, and alumni performance or employer feedback.

While there have been calls from lawmakers (e.g., Senator Elizabeth Warren[10]) for accreditors to demonstrate good outcomes as defined by graduation rates, job placement, student debt ratios, and so forth, these metrics miss the critical review of student learning outcomes or attainment of competencies that programmatic accreditors employ.

Further, the application of a set of quickly calculated quantitative indicators across a diversity of programs and institutions risks oversimplification, and may

mislead students as they make decisions about pursuing higher education. Graduation rates must be understood within the context of the program and the goals of the student. With the "traditional" high school student going immediately to college and finishing in four years no longer being the norm, metrics such as time to graduation, as well as graduation rates, must be examined in the context of part-time attendance, working students, and older students with family obligations. Similarly, postgraduation earnings is a very incomplete metric that captures nothing about student competency or societal contribution: teachers and social workers contribute a great deal to society but typically earn lower salaries. Even employment rates must be considered in the context of the need for services, geography, and prevailing economic conditions. Understanding contextual issues such as these is critical to considering the quality of a program or institution that may produce highly competent graduates, but in areas where jobs are difficult to find or salaries are low.

Laws, Regulation, and Politics

Specialized and professional accreditors face a variety of issues if they pursue external quality review and approval (recognition). As noted in the following sections, these include compliance with recognition requirements, transparency in the accreditation process, student outcomes and the Higher Education Act, and new models of quality review.

The Recognition of Accreditors

Many specialized and professional accreditors are recognized by the secretary of education or CHEA, and several have chosen to be recognized by both. *Recognition* means that the accreditor has submitted to an external quality review and has been found to meet the requirements established by the recognizing body. This might be thought of as accreditation of accreditors, and most accreditors consider it an important process to undergo: just as they perform an external quality review of programs, they demonstrate that they see the value in having their own processes examined for quality by an external entity. Recognition is not accreditation, however, and there are several challenges faced by accreditors in the recognition process. And, those accreditors not recognized by either CHEA or the secretary of education and thereby not subject to specific recognition requirements still operate in a context in which accreditation practice evolves in part due to recognition requirements.

For accreditors to be recognized by the secretary of education, there must be a federal statute or link requiring accreditation by a recognized accreditor so that institutions or programs can participate in federal programs such as Title IV student loans and scholarships under the Higher Education Act, Veterans Affairs residencies and employment, and various funding programs offered by the US Department of Health and Human Services, among others. The regulations promulgated to implement the federal statutes and determine what accreditors must do in order to serve this gatekeeping role are central to many challenges faced by all accreditors.

Transparency and Information in the Accreditation Process

The US Department of Education (ED), its advisory body, the National Advisory Committee on Institutional Quality and Integrity (NACIQI), and lawmakers have expressed the desire for the accreditation process to be more transparent, and have called for accreditors to provide more information. ED began implementation of a Transparency Agenda for Accreditation[11] in November 2015, citing the need for significant improvement in both the rigor and flexibility of accreditation and the promotion of outcomes-driven accountability. The agenda included executive actions: publishing each accreditor's standards for evaluating student outcomes in a chart with each agency's stated student achievement measures, including any specific thresholds. Increased transparency was also sought by enabling ED to post online the publicly releasable portions of the accreditor-institution correspondence about a decision to place that institution on probation.

While this may be a laudable agenda, it has also been fraught with errors and omissions. Unfortunately, the report about the outcomes practices of accreditors compiled and posted by ED had inaccuracies that left affected accreditors scrambling to have the information corrected. This situation mirrors a similar issue that accreditors have faced for several years with outdated or inaccurate information in the ED public database of accredited schools and programs. Programs that have been on probation and then removed from that status can stay in the database in the "probation" category indefinitely. With the diversity that exists in the higher education system in the United States, there are problems neatly and accurately categorizing the information, and in maintaining accuracy of information as programs shift. While there have been recent attempts to improve the accuracy of its database by having accreditors input data through a portal,[12] a simpler solution would be for ED to identify required elements and refer the public to the

accreditors' own websites for the most accurate and current information about accredited programs.

Another concern with ED's transparency agenda is that it will lead to all accreditation documents becoming part of the public domain. While programmatic accreditors agree that timely and accurate information should be available to the public, it should be managed in a thoughtful manner to avoid unintended consequences. Just as there is a diversity of professions, there is a diversity of information provided by specialized and professional accreditors in various documents. For example, accreditors provide the public with information that includes details of accreditation processes, accreditation status, accreditation terms, schedules for reviews, adverse actions, and reasons for adverse actions. The challenge is how to fulfill the role of assisting a program in continuous quality improvement while providing as much information as possible to the public. The opportunity for a safe space—in which accreditors and programs may operate for the quality improvement function—could be lost if every document and communication is made public. Publicly releasing documents with suggestions for improvement can easily be perceived as an indication of poor quality, when that is not the case. If all accreditation documents become publicly available, accreditors will need to find alternate ways to address quality improvement that does not put programs at risk of undeserved negative perceptions.

A final note about the transparency agenda is that it includes increasing coordination and communication within ED and among accreditors, other agencies, and states. Thoughtful efforts by ED to improve communication would be supported by most accreditors. Further, creating formalized communication channels to enable communication between accreditors about a given institution would be a valuable resource to the quality assurance efforts of each.

Student Outcomes and the Higher Education Act

Policy deliberations and recommendations by NACIQI have noted concerns about the process by which accrediting agencies are recognized by the secretary, and have included ideas about increasing transparency, risk-based accreditation, and formalizing consideration of student achievement in the review process. A recent pilot project[13] included a series of questions to be posed that consider student achievement and other outcome and performance metrics in the hearings for accreditors that come before it for consideration of their recognition renewal. The pilot draws upon information from the College Scorecard[14] and recognizes the role that recognized accreditors play in ensuring improve-

ment among the institutions they accredit that are at risk of falling out of compliance with standards. The four question areas for accreditors cover: general performance and outcomes of the institutions accredited, decision activities of and data gathered by the accreditor, standards and practices with regard to student achievement, and accreditor activities in improving program/institutional quality.

In one example, questions drawn from College Scorecard data include: percentage rates of students who are Pell Grant eligible; graduation rates; and debt, repayment, and default rates. Programmatic accreditors typically get graduation rates from accredited programs, but the other indicators are not available to them, and the Scorecard provides data at an aggregate level such as "Health Professions and Related Programs" as opposed to a specific profession such as occupational therapy. Additionally, several programmatic accreditors operate in professions that require a graduate-level degree for entry to the profession, a nuance not captured by this database. Some questions in this area are valid for accreditors with the Title IV link to federal student aid. However, not all programmatic accreditors have this link and in fact are not required to collect information about debt repayment and default rates. These distinctions are not always made clear in review documents and inquiries in the recognition hearings held by NACIQI.

Additionally, NACIQI hearings have included questions of the accreditors under review about whether and how they control the number of programs and graduates in order to match workforce needs. Such questions illustrate what has been a growing lack of clarity about the roles and responsibilities of the triad (regulators of higher education in the United States: the federal government, the states, and accreditors). In the triad, the purpose and focus of specialized accreditation is to ensure educational quality and continuous quality improvement of higher education. Concerns about the job market lie within the purview of another entity (in most cases, states would be the location where the match between workforce demand would be addressed).

NACIQI has also posed questions about benchmark data related to performance metrics established by the accreditor, such as the process to determine the cut-off figures and what kind of periodic analysis is undertaken to determine the reliability and validity of the metrics used. This new line of questions appears reasonable, especially if an evidence-based approach to accreditation is considered of value. Many programmatic accreditors do set numeric benchmarks for indicators such as graduation, job placement, and certification or licensure, and all programmatic

accreditors hold accredited programs accountable for student learning outcomes. The opportunity for improvement for programmatic accreditors is to ensure that they can demonstrate that the outcome metrics used, and benchmarks they have established, are valid and reliable.

NACIQI has also been interested in summary data about decision activities of and data gathered by the agency, including the favorable, monitoring, and adverse actions taken, as well as information about the standards cited for the monitoring and adverse actions. While some parts of this request may appear reasonable, the particular interest in how many institutions/programs have had their accreditation withdrawn or how many adverse actions have been taken implies that the number of adverse actions taken by the accreditor is an indication of how well an accreditor is doing its job. This is not the approach or philosophy of programmatic accreditation. No specialized or professional accreditor would use the number of programs subjected to adverse actions as a bragging point. Accreditors spend time counseling programs to help them avoid getting to the point of adverse actions once they have become accredited, and prior to that an accreditor will work to ensure that the program does not get accredited in the first place if it does not appear to be able to meet accreditation requirements.

ED apparently shares NACIQI's concerns about student achievement and outcomes.[15] The transparency agenda includes legislative reform proposals that will allow the secretary of education to establish standards for student outcome data to be used by accrediting organizations when reviewing and evaluating colleges and universities, including student graduation rates, loan repayment rates, loan default rates, and job placement rates, and setting minimum standards that colleges must meet. Senator Elizabeth Warren's Accreditation Reform and Enhanced Accountability Act 2016 mirrors this proposition.[16] As mentioned, many programmatic accreditors already establish such benchmarks (quantitative thresholds related to graduation or retention rates, placement rates for employment or internships, or licensure exam pass rates) and probably would have no difficulty meeting such requirements. For this kind of requirement to be effective, there would need to be a way to ensure that quantitative measures would be reviewed in context (e.g., job availability and regional salary variance). There is also the concern that the ability of the accreditor to involve its communities of interest in this prescriptive system will be compromised. Stakeholders (e.g., employers, professionals, and researchers) contribute to the identification and development of outcome metrics and benchmarks specific to the professions in which students are being prepared. This is far

preferable to having an external agency setting such parameters, especially when that agency has no content expertise in the profession.

New Models of Accreditation

Also of interest to NACIQI, ED, and Congress is the concept of risk-based accreditation. Risk-based accreditation implies a differentiated approach wherein different processes are applied based on quantitative benchmarks (e.g., completion rates) or the program's history related to compliance concerns. If the program meets such established expectations, then the program may not be subjected to the full review or may experience a lighter touch each accreditation cycle. New applicants would undergo a full review and programs that have had difficulty complying with standards would have more intense and more frequent scrutiny.

While "risk-based" accreditation has recently come into policy focus, it would be important to note that many specialized accreditors already employ risk-based approaches. For example, the length of the term of accreditation may vary based on the status of the program, and monitoring is more frequent among programs with identified compliance issues. In addition, any information that the accreditor learns from regular monitoring, substantive changes, or even the media may trigger a request for additional information to be provided by the program to the accreditor, or, depending on the severity, an off-cycle, focused visit by the accreditor may be required. With such nuances already in force and developed by stakeholders in the profession, it is not clear what value would be gained if new procedures were to be imposed from outside the profession. Further, specialized accreditation is about much more than completion rates or other easily obtained numerical indicators. It is about ensuring that graduates are competent to practice and that academic programs are evolving to keep pace with changing needs of employers and best practices in the field. Confirming that programs are addressing these needs, and ensuring that the public interest is protected, requires regular and comprehensive review.

A Possible Exodus of Programmatic Accreditation from Federal Recognition

In the end, individual specialized or professional accreditors must decide whether federal recognition is worth trading their focus on improving professional practice for the benefit of the public for a focus on areas that interest NACIQI, ED, and Congress but do not improve professional practice. If there are

a significant number of programs that take advantage of the benefits provided by the federal link, there may not be much of a choice. A few accreditors[17] during recent years have determined that the number of programs that utilized the link were too few to justify the resources put into the recognition process and have voluntarily withdrawn from recognition. In most cases, the programmatic accreditor will have a requirement in their standards that the program must operate in an institution that has regional or national accreditation—thus ensuring that students will have access to federal aid.

Litigation and Indemnification in Accreditation

All accreditors risk the possibility of lawsuits, usually from disgruntled programs and institutions. Although not affected by lawsuits to the extent that the institutional accreditors have been, programmatic accreditors do get sued, and sometimes they have difficulty finding insurance. Insurance rates can be challenging for smaller agencies. And, if litigation occurs, costs for a single lawsuit can be devastating to the financial resources of an accreditor.

Most judges have deferred to the expertise of the accreditor and remanded cases back for review. A recent ruling,[18] however, against an institutional accreditor established a precedent, with the judge fining the accreditor and reversing the accreditation decision. Even though the accreditor subsequently prevailed on appeal and the judge was found to have overstepped, this was a very concerning occurrence for all accreditors. To add to the current questionable climate for accreditors, when a regional accreditor (the Western Association for Schools and Colleges-Accrediting Commission for Community and Junior Colleges) found an institution out of compliance and attempted to take an adverse action, it was subjected to lawsuits, inconsistent treatment by ED, and criticism by state and federal lawmakers.[19] Although it is inconceivable that accreditors should make decisions based on the risk of litigation, some indemnification is needed if they are to be able to hold programs accountable for meeting quality standards.

State Regulations, Entry to Practice, and Innovation

Because of the unique nature of specialized and professional education and practice, specialized and professional accreditation is subject to particular challenges in state regulations, entry to practice, and innovation.

The states, as one-third of the triad that regulates higher education, pose a certain set of issues for programmatic accreditation. There is inconsistency

across states when it comes to requirements for entry to a profession. In cases where there is a licensure or certification exam, there may be a single exam for all states, a state or a group of states may have their own exams, or some states may not require any exam while others do—all within a single profession. Some states allow different pathways to certification and access to a profession; for instance, if the program is accredited, the student can apply for access directly upon successful completion of the program (or if the program is not accredited, the student has the option of finding an experiential placement or practicum for a defined period), and then proceed to legally practice in the state. Some states specify that completion of an accredited program is necessary. Some states may identify the accreditor in its regulation or statute. Some states require that the accreditor be recognized by the US secretary of education, which may have nothing to do with access to Title IV student aid. For professions where some states require completion of an accredited program while others do not, the potential for confusion is high when students are trying to decide where they want to go to school and where they may potentially want to work. It is incumbent on programs and institutions to provide accurate information so that students will know that the program of study will or will not meet the requirements to enter a profession and in which state(s). While it is not the role of programmatic accreditors to educate students on these intricacies, it would be helpful if specialized and programmatic accreditors were to include requirements in their standards so that institutions and programs provide adequate information.

Another issue related to the perception by some that accreditation stifles innovation is the diversity in state laws that pertain to educational requirements for any given profession. For example, innovation such as competency-based education (separation of credits from seat time) may be embraced by accreditors—but individual states may specify in statute a required number of credit hours for a program for classroom or practical placements—which is outside of the control of the accreditor.

Yet another challenge is the notion that specialized and professional accreditors should control the employment markets in their respective fields so that new programs are not accredited in professions or fields where graduates may have limited employment opportunities. Apart from the obvious restraint of trade implications, such actions would be outside of the capacity, scope, and authority of programmatic accreditors. As the different roles of the triad are revisited, it will be worth reclarifying that accreditors are concerned with quality education and quality improvement, and that states are responsible for granting legal status

to education institutions in their jurisdiction. It makes a lot of sense that states should require programs and institutions to demonstrate proof of need before allowing new programs to start up in professions with poor job prospects.

Institutions

In recent years, closures of large for-profit institutions and abuses of students through inability to get a job and pay back federal student aid has turned the spotlight on accreditors in general—and the question of how an accreditor could have let things get to such a bad state is increasingly voiced. While this issue falls mainly in the domain of institutional accreditors, who have the bulk of the responsibility for Title IV funding, specialized and professional accreditors are challenged on related fronts.

In one significant concern, inadequate, inaccurate, or incomplete information provided by institutions to prospective students can give the impression that institutional accreditation is sufficient when specialized or professional accreditation is required for employment in their professional field. As already described, there can be little consistency across states regarding requirements to enter a profession and the need to graduate from a program with programmatic accreditation. In fairness to institutions, it can be a daunting task to provide information about every state where the student may consider looking for employment and whether the program offered meets requirements—but a better job of providing this information can be done. In a related concern, some national accreditors may create an impression that their institutional accreditation is adequate, and although they may even use content matter experts to review individual programs, this does not equate to national specialized and professional standards that have been developed by the inclusive and expert process employed by specialized and professional accreditation. All accreditors should have requirements in their standards for institutions and programs to provide current information about whether the programs offered meet requirements for entry to the profession, and this information should be easily accessible and provided in clear language.

Stakeholders and Accreditation

Although the accreditation process includes input from a wide range of stakeholders, specialized and professional accreditors navigate conflicting pressures from stakeholders within their profession who have widely differing expectations about what the accreditor should be doing. The possibilities are myriad for tension among the different constituencies within a profession:

- some stakeholders would like to control the accreditation process,
- others would like the accreditor to take the lead in defining the profession,
- the professional association may want practice to include areas not addressed by what is being taught by the academics,
- traditionalists within a profession may resist changes in accreditation standards that allow for new educational delivery methods,
- others may object to new accreditation standards that allow for expansion of the role and scope of practitioners,
- some may claim that accreditation requirements are too prescriptive and not flexible enough to allow innovation, and
- competing programs may object to the accreditation of new programs when the job market is saturated.

In the ideal, the major stakeholders within a profession operate collaboratively yet independently to benefit and protect the public and advance the profession, according to the mission of the stakeholder. The academics prepare students for entry to the profession, and they do research that improves practice; the regulators (states and examination boards) set entry-to-practice requirements that protect the public. The professional association promotes the profession by advocating to the public and lawmakers and providing continuing education opportunities for practitioners. The accreditors set educational quality standards so that programs meet a minimal level of quality and strive for ongoing improvement.

The level of tension among stakeholder groups fluctuates based on numerous factors. Take an example of scope of practice in a health profession in a single state: the profession may have a very defined description of what a professional is allowed and not allowed to do as part of practice in that state. The academics may identify a new treatment modality and prove its success or appropriateness through research. If state law is prescriptive, legislation may be necessary to incorporate the new modality into legitimate practice. The professional association may then advocate to lawmakers to amend the law. If the new method is not specifically prohibited by the accreditor, however, it may still be taught, even though the students will not be able to legally use it. Or the accreditor may revise its standards to allow and encourage programs to teach the method. Or the accreditor may have purposefully broad standards that both encompass the details of practice that would be tested on a licensing exam and allow for new methodologies to be incorporated. And by doing that, the accreditor allows for innovation but may also be criticized for

straying from traditional practice. The forgoing example applies to a single state—it is important to note that accreditation is a national endeavor—so in professions with diversity in requirements across the states, the standards must be designed to accommodate that diversity.

The Press Does Not Always Help

Press coverage of accreditation issues can contribute to misperceptions about accreditation by rarely making the distinction between institutional and programmatic accreditation in their articles or by linking institutional accreditors with programmatic accreditors. For example, a *Wall Street Journal* article[20] related a senator's characterization of higher education to being controlled by a cartel of universities that in turn controls the accreditation process—and then the regional accreditors and the accreditation of engineering are referenced as examples, with no distinction offered for the difference between the two types of accreditor.

Without a distinction being made, the impression is created that the issues are the same for all accreditors without regard to type. In this age of sound bites, the intricacies of specialized and professional accreditation are not as compelling, nor are they typically linked to the school closures, low graduation and completion rates, or abuses of federal student aid. Specialized accreditors are responsible for only a small component of federal student aid money[21] and typically do not come to the spotlight for accrediting problem institutions. Despite this, they are often linked to bad actors (both institutions and accreditors) in the news simply by virtue of being an accreditor. Preventing and addressing inaccurate public perceptions about specialized accreditation remains a continuing challenge for programmatic accreditors.

Conclusion

Specialized and professional accreditation serves the public interest by ensuring that students become competent practitioners in their field of study. In the current environment, where accreditors and institutions are called upon to demonstrate accountability, transparency, and good outcomes, this type of accreditation faces several challenges. The differences between programmatic and institutional accreditation and the importance and necessity of the peer-review process to the integrity of the former may not be understood. Calls for accountability by lawmakers and recognition bodies that include a defined set of quantitative outcomes indicators can put accreditors and institutions at risk when not evaluated within context, or if the relevant outcomes identified by programmatic accreditors and

stakeholders lie outside that set of metrics. Requirements for transparency that include public release of all accreditation documents may affect the quality improvement function of programmatic accreditation. Inconsistency across states in requirements for scope of practice and completion of accredited programs for entry to practice poses challenges to the national endeavor of specialized and professional accreditation. Stakeholder perceptions about what programmatic accreditors should be doing may differ broadly, and lack of clarity of the roles and responsibilities of ED, the states, and accreditors can result in expectations being placed on accreditors that are outside their purview.

Going forward, there are several opportunities for specialized and professional accreditors. Improved clarity about the roles of the members of the triad and the differences between programmatic and institutional accreditors would relieve pressures associated with unrealistic expectations by stakeholders and lawmakers. Better communication among all accreditors and ED could enhance the quality review of programs and institutions. Stronger requirements from all accreditors for programs and institutions to provide easily accessible and clear information about whether programs meet requirements for entry to practice / job eligibility would better serve students when making decisions about where to go to school. The inclusive nature of programmatic accreditation that involves stakeholders in all aspects of the accreditation process could serve as a model for other accreditors: stronger associations with all stakeholders could assist in the establishment of relevant outcomes indicators and benchmarks, and strengthened relationships with business and industry through requirements for institutions to establish such relationships (e.g., advisory councils) with employers would help to ensure that students finish programs with the desired skills and competencies. While this already happens in programs with specialized and professional accreditation, programs that are not programmatically accredited, and their students, would undoubtedly benefit.

NOTES

1. The terms *specialized*, *professional*, and *programmatic* are used synonymously in this chapter.

2. Calculations by the author are based on membership in or recognition by the Association of Specialized and Professional Accreditors, the US Department of Education, and the Council for Higher Education Accreditation.

3. The terms *competency* and *competencies* in this chapter are distinguished from "competency-based education," an alternative to the credit hour–based system. In

competency-based education, student proficiency is measured through assessments or credit for prior learning, rather than time spent in the classroom.

4. Lamar Alexander, "Higher Education Accreditation Concepts and Proposals," March 23, 2015, http://www.help.senate.gov/imo/media/Accreditation.pdf, 1.

5. While institutional accreditors may designate their accredited institutions to be "members," the clear majority of specialized and professional accreditors do not.

6. "College Accreditation in the United States," US Department of Education, accessed January 3, 2017, https://www2.ed.gov/admins/finaid/accred/accreditation_pg13.html.

7. "Recognition of Accrediting Organizations: Policy and Procedures," Council for Higher Education Accreditation, https://www.chea.org/userfiles/Recognition/Recognition-Policy-2010.pdf.

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PART II / Perspectives of Institutions

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Fixing a Broken Accreditation System

How to Bring Quality Assurance into the Twenty-First Century

Anne D. Neal and Armand Alacbay

From the perspective of institutions, there are many challenges inherent in working within the present quality assurance system. This chapter begins consideration of these challenges with an examination of the impact of an institutional accreditation system that is insular, opaque, and costly on institutional operations and autonomy. An alternative approach is proposed that would change the gatekeeping relationship between institutional accreditation and financial aid.

The accreditation system is broken.

The current system, which couples peer review and enforcement, simply cannot function as a gatekeeper of federal funds.

The problems inherent in accreditation begin with the regulatory capture that is embedded in the system. Accreditors are membership bodies, funded, operated, and staffed by the very people who benefit from Title IV. By making accreditors gatekeepers over federal financial aid funds, the system gives rise to anticompetitive "guild-like" standards such as those issued by the American Bar Association and the American Psychological Association that limit the use of online education (generally cheaper), nontenured faculty (generally cheaper), and other inputs—with no clear tie to educational quality. Innovation is inhibited, costs rise, and,

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sadly, students find themselves with mounting debt and often no degree to show for it.

The existing process of accreditation is also largely opaque, offering virtually no data about individual programs or departments, no comparability in assessment of student learning. Sadly, the negative impact is greatest on those students who typically have the most limited financial means and are least familiar with how higher education works.

And while colleges and universities have boards of trustees whose responsibility is to ensure that the institution acts in the public interest, federal law (in particular, the "blank-check" provision of the existing statute) gives accreditors virtually untrammeled, and unreviewable, authority to interfere in the management and governance of institutions—far from peer review. In the case of public universities governed by state law, this grant of federal authority to private accrediting agencies raises serious constitutional concerns under the nondelegation doctrine.

Finally, the process is costly. Even vastly wealthy institutions such as Princeton and Stanford are complaining. It is worse for small colleges with limited operating budgets. The direct costs of an accreditation review can easily exceed $1 million, not counting opportunity costs. Many schools employ a whole new staff to manage long self-studies and other bureaucratic check-offs that may or may not have anything to do with the institution's priorities.

With unsurprising predictability, every time Congress prepares to reauthorize the Higher Education Act, regional accreditors and groups such as the Council of Regional Accrediting Commissions promise incremental changes to the system, claiming more substantive change is unnecessary. Typically, once lawmakers' attentions are focused elsewhere, interest groups' appetite for accountability abates.

Moreover, the problems of accreditation are not just of one specific accreditor or one particular sector. The problems are structural; quality improvement and quality assurance do not go together. Peer review (what accreditation was intended to be) is collegial and focused on continuous quality improvement. Quality assurance (the role that federal law requires accreditors to fill now) is often punitive because it carries with it the possibility of being put out of operation by being denied access to Title IV funds.

As Congress again revisits the Higher Education Act, the answer is clear: to fix a broken system, accreditation must be delinked from its role as a gatekeeper and enforcer—and return it to its original and critical role as peer reviewer. Accreditors cannot be both peer reviewers and enforcers holding the purse strings for

billions in federal dollars. For more than 60 years, American higher education has been suffering from this regulatory schizophrenia and bearing the consequences. Rather than paying attention to students, taxpayers, and elected officials, the accreditors have been far more oriented toward protecting those who are *in* the system.

Consumers can be better protected through transparent reporting of metrics, proof of financial stability, and clear evidence that students are learning. A modern system of quality assurance would *deregulate* and would also: (1) provide *audited* clear, consistent—and comparable—information annually about financial stability, price, financial aid, demographic success, graduation rates, and student learning gains to help parents and students make decisions; (2) not overwhelm colleges with counterproductive and costly red tape; (3) free accrediting agencies to focus on their original mission of self-improvement through peer review by ending one-size-fits-all regional monopolies; and (4) at a minimum give institutions a choice and allow experimentation with different approaches. Finally, and most importantly, it would eliminate the existing "blank-check" provision that encourages accreditors to intrude unconstitutionally upon institutional governance.

Far from enhancing government intrusion, this alternative would provide accurate and timely consumer information and limit the government's role to that of a "watchman," ensuring the honest reporting of consumer information.

A Captive Audience for Accreditors

The linking of accreditation to financial aid began more than 50 years ago with the idea that private accrediting agencies could ensure that federal student aid flowed only to high-quality educational institutions by serving as a "reliable authority" on the "quality of education or training offered." It attempted to leverage the strength of an existing network of private accrediting organizations—peer review—as a way of maintaining the institutional independence of America's colleges and universities.

Today, the accreditation system is private in name only, serving instead as an agent of the federal government as gatekeeper of more than $120 billion in financial aid. According to the Department of Education, more than 85 percent of colleges and universities are accredited by one of six regional accreditors, giving these six agencies the ability to determine the operating fate of the vast majority of America's four-year institutions.

For most colleges and universities, maintaining accreditation is mandatory to remaining in operation, because federal law requires students to use federal financial

aid only at accredited institutions. While a very small number of institutions opt not to accept Title IV funds in order to maintain their autonomy, the truth is that most colleges and universities would not be able to survive without federally subsidized tuition revenue. Even the potential of losing accreditation is an enterprise risk of the highest degree.

Moreover, federal law makes it onerous for an institution to change its accrediting agency, requiring the secretary of education to review "all materials relating to the prior accreditation" of the institution and to determine that "reasonable cause" exists to change accreditors. Therefore, in practice, the accrediting standards that apply to a school are generally dictated by its geographic location. Institutions are understandably reluctant to challenge an accrediting agency since there are virtually no alternatives to the regional monopoly. National accreditors, such as the Accrediting Commission of Career Schools and Colleges, are not practical alternatives for many currently regionally accredited institutions to obtain eligibility to Title IV funds, because existing national accreditors are typically specialized in scope and lack the requisite capabilities to review the broad range of programs offered by most colleges and universities.

An Insular System

The colleges and universities that accreditors regulate not only fund the accreditation system in the form of dues to accrediting agencies and expenses for accreditor reviews but also provide the staff (i.e., administrators and faculty who stand to benefit from institutions' receipt of federal funds) who constitute the accreditation review teams. This "collegial" system provides few incentives for accreditation teams to take a hard line against poorly performing institutions—indeed, denying accreditation to a school means the accreditor loses its dues.

At the same time, accreditors that sanction member institutions commonly do so for reasons that help institutional insiders. Since review team members are comprised largely of faculty and administrators from within the same network of institutions, it is not unusual for institutional constituencies to use the accreditation process to lobby their accreditor for more resources and pet projects (e.g., a new library or faculty program) or to stifle reform efforts at their institution. More than a few presidents and trustees have found their efforts to cut costs or advance reforms blocked by accreditors whose guild-like standards sustain the status quo.

Nowhere is this insular focus clearer than in the stated criteria by which accreditors judge institutions' eligibility, focusing on input measures that commonly

benefit administrators and faculty rather than output measures that benefit students and taxpayers, and that provide true accountability. For example, the American Bar Association, which accredits law schools, demands a fixed amount of classroom instruction, ensuring three years of seat time, even if two years of study (plus some measure of competency, such as passage on a bar exam) may be more than sufficient preparation for the practice of law.

Standards like these have little bearing on educational quality and inevitably raise costs because they incentivize institutions to focus on compliance with arbitrary (and arguably outdated) delivery models instead of on innovation that rewards student success and affordability.

Some regional accreditors require that institutions implement hiring standards that prioritize particular academic credentials over experiential qualifications. The Southern Association of Colleges and Schools (SACS), for example, states that "when determining acceptable qualifications of its faculty, an institution gives *primary consideration to the highest earned degree* in the discipline." In September 2017, the Higher Learning Commission (HLC) will revive a previously instituted standard that states that "qualified faculty members are identified primarily by credentials" and requires that "faculty teaching general education courses, or other non-occupational courses that transfer, typically hold a master's degree or higher in the discipline or subfield." These rules lose sight of the fact that some of the most knowledgeable people in their field do not come from a traditional academic background. Some best-selling historians would be wonderful history instructors (think David McCullough) but do not have advanced degrees. Plenty of writers could amply teach a course in literature despite the lack of a doctoral degree. An accomplished engineer should not be barred from teaching a college-level mathematics course simply for not holding a PhD. And yet that is what happens under accreditation.[1]

Other standards by regional accreditors direct institutions to maintain adequate numbers of full-time faculty and staff. While the definition of "adequate" is often not clearly defined in the accreditors' standards, in practice this standard discourages institutions from providing academic offerings in more cost-efficient ways, such as course-sharing agreements or public-private partnerships. Accreditors' input-focused standards protect the existing workforce in the sector but do little to ensure educational quality and inevitably drive up the costs of higher education. In the early 2000s, SACS placed Campbell University on probation in part because its standard faculty teaching load of 15 hours per week was higher than the accreditor-prescribed 12 hour-per-week maximum. In response, the school

consolidated class sections, bringing what were originally relatively small freshman and sophomore classes to sections of 60 or more.[2]

Such emphasis on how resources are allocated, rather than on results—such as student learning outcomes, affordability, and student debt loads, graduation rates, or other indicators of quality and cost—demonstrates the danger of entrusting accreditors with exclusive gatekeeping power over federal financial aid.

A System That Stifles Reform

American higher education already has a constituency in place charged with protecting the public and taxpayers: boards of trustees. As fiduciaries, trustees are responsible for ensuring that the colleges and universities they govern fulfill their educational mission while being faithful stewards of the resources they receive. "Board members should be receptive to all, but beholden to none," wrote a group of 22 higher education leaders headed by City University of New York's former board chair and Yale president emeritus Benno Schmidt in a 2014 statement titled "Governance for a New Era," adding that "their indispensable value to students, institutions, and to the nation rests upon their independent judgment."[3] Similar to the board of directors of a nonprofit hospital or other charitable organization, a college board of trustees has both the full legal authority and legal responsibility to ensure that the school is serving the public interest, and not those of insiders.

Yet unlike boards in other nonprofit sectors, higher education trustees have minimal flexibility to make policy decisions that could be unpopular with faculty or administrators, because a federal statute gives accreditors—already empowered with the ability to cut off a school's access to federal student aid—the authority to set practically any standards it wants, including rules for how an institution should be governed.

Even the most resolute of boards dedicated to safeguarding the academic and fiscal integrity of their institutions can become sidetracked by regional accreditors eager to substitute their judgment. The reason? The current Higher Education Act includes a "blank-check" clause, giving accreditors the unfettered ability to dictate institutional governance. Under the statute:

> *(g) Limitation on scope of criteria.* Nothing in this chapter . . . shall be construed to permit the Secretary to establish criteria for accrediting agencies or associations that are not required by this section. *Nothing in this chapter . . . shall be construed to prohibit or limit any accrediting agency or association from adopting additional standards not provided for in this section.* Nothing in this section shall

> be construed to permit the Secretary to establish any criteria that specifies, defines, or prescribes the standards that accrediting agencies or associations shall use to assess any institution's success with respect to student achievement.[4]

Under this clause, presumably designed to prevent federal overreach by the secretary of education, accreditors have expanded their role beyond their originally intended function of quality assurance and peer review, intruding into the management and governance of America's colleges and universities. If an institution is sanctioned by an accreditor for an issue related to the institution's internal governance, it has no recourse except to the accreditor itself. The combination of accreditor as gatekeeper, the regional accreditor monopoly, and the "blank check" have produced a coercive regulatory enterprise that has stifled innovation, raised costs, and generally upheld the status quo over the past 50 years.

The result is a regulatory environment that gives governing boards little incentive to do anything that may raise the ire of accreditors. In 2012, the Board of Visitors of the University of Virginia (UVA), seeking change in the university's strategy to address rising costs, sought the removal of the university's president. Even though state law—and the institution's own bylaws—gave the board the exclusive legal authority to make personnel decisions with regard to the university president, the faculty objected so vigorously that the board ultimately reversed its decision.

What should have then concluded as an internal matter, however, caught the attention of UVA's regional accreditor. SACS placed UVA (the country's oldest public flagship university) on "warning" status—threatening its eligibility to federal financial aid—for the board's failure to consult with the faculty prior to seeking the president's resignation. This occurred despite the fact that the Board of Visitors is legally appointed by the governor of Virginia to oversee the university on behalf of taxpayers.[5]

This was not the first time accrediting bodies intervened in institutional governance, frustrating initiatives of the governing board—a point made by former US senator and president emeritus of the University of Colorado Hank Brown in an op-ed for the *Wall Street Journal*. There, Brown cited the example of the University of California Board of Regents, who found themselves under fire from their regional accreditor for being "unnecessarily harsh" (the accreditor's words) with administrators when attempting to address rising administrative costs. The message accreditors send to trustees is clear: crossing faculty or administrator interests is a risky proposition.[6]

One regional accreditor has begun to interpret this broad grant of federal power as giving them the authority to supplant the decisions of state officials with regard to their public universities. In 2016, after a number of high-profile issues involving academic and financial oversight at the University of Louisville, the governor of Kentucky signed an executive order dismissing the university's board of trustees and replacing its members with new appointments. Even as the state courts ultimately blocked the governor's action, SACS placed Louisville on probation—not for anything academically related, but for concerns of undue external influence in the governance process. Less than a month later, SACS again asserted itself into a state governance issue, sending a letter to policymakers in Alabama urging it to pass legislation removing the state governor as the board chair of the state's public universities, citing a "conflict of interest" with the governor's appointing authority.[7]

Such unfettered authority raises serious constitutional concerns, most notably under the private nondelegation principle, which prevents Congress from delegating governmental functions (e.g., the regulation of industry) to purely private actors. The US Supreme Court most recently addressed this doctrine in 2015 in *Department of Transportation v. Association of American Railroads*,[8] a case in which the American Council of Trustees and Alumni, among others, submitted an amicus brief drawing parallels between the railroad industry (in which Amtrak is both a market participant and market regulator) and the higher education sector (where accrediting agencies are operated by university insiders who have a vested interest in maintaining the status quo). Despite a narrow ruling favoring Amtrak, a concurring opinion by Justice Samuel Alito reiterated that delegating government authority to private actors is a constitutionally disfavored practice: "This case, on its face, may seem to involve technical issues, but in discussing trains, tracks, metrics, and standards, a vital constitutional principle must not be forgotten: Liberty requires accountability."[9]

Accreditation: No Guarantor of Quality

This sorry situation might be tolerable if accreditors could show that their convoluted evaluation processes led to student success, but just the opposite is the case. Sobering findings about the state of American higher education over the past few decades belie the idea that the increasingly intrusive nature of accrediting reviews has contributed anything of value in quality assurance. In 1992 and 2003, the US Department of Education's National Assessment of Adult Literacy showed that a majority of college graduates could not compare the opinions in two editorials or compute the cost of food items when given the price per ounce. In

2011, Professors Richard Arum and Josipa Roksa's report *Academically Adrift* drew widespread attention with its conclusion that more than one-third of graduates of the accredited institutions they studied left college with little or no cognitive gain after four years.[10]

While the United States spends nearly twice the per-student average of any industrialized nation, the accreditation system allows scores of institutions to graduate less than one-quarter of their students in six years, saddle students with thousands of dollars in debt (with no degree to show for it), and stay in operation nonetheless. The one-size-fits-all system of accreditation makes no distinction for the consumer between schools with documented evidence of student learning gains and those with no such evidence.

Nothing in the accreditation process provides institutions, students, or families with an objective (much less quantifiable) measure of student learning, instructional quality, or academic standards. Existing accreditor standards that purport to address student learning are ineffective because they are largely *self-referential*—that is, they rely on the institutions themselves to assert whether students have made intellectual progress since high school or whether their graduates have attained a level of basic knowledge that would be expected of them. The "assurance" in higher education's quality assurance process comes almost entirely from the institutions themselves.

Despite the fact that there are several well-established, nationally normed instruments available for institutions to assess student learning gains objectively (e.g., the Collegiate Learning Assessment by the Council for Aid to Education, the Proficiency Profile by the Educational Testing Service, or the ACT's Collegiate Assessment of Academic Proficiency), accrediting agencies instead opt only to require colleges and universities to create their own program of assessing institutional effectiveness. Justifying this approach by arguing that mandating specific measures would violate institutional autonomy, accreditors merely ask institutions to certify that they have a process in place to assess themselves.

For example, the Middle States Commission on Higher Education standards dedicated to "Educational Effectiveness Assessment" merely require institutions to demonstrate that they perform "organized and systematic assessments . . . evaluating the extent of student achievement" and that they consider the results thereof "for the improvement of educational effectiveness." The standard only mandates that the institution have an assessment system *in place*; nowhere does it suggest any minimum threshold for graduation rates, default rates, or any other metric that could be considered an objective standard of quality assurance.

Other regional accreditors' standards similarly focus on procedure instead of outcomes. HLC's criteria require that an institution demonstrate "clearly stated goals" of student learning, and that its assessment processes include "substantial participation of faculty and other instructional staff members." SACS calls for institutions to have in place a "Quality Enhancement Plan" that "focuses on learning outcomes and/or the environment supporting student learning" and also "identifies goals and a plan to assess their achievement." In the eyes of accreditors, form trumps function when it comes to assessment—as long as institutions articulate a structure that is plausible, accreditors will deem them suitable.[11]

Writing standards that simply admonish colleges and universities to take student learning seriously are not likely to bring about any assurance of educational quality. But that's exactly what accreditors have allowed, with the result that scores of institutions remain regionally accredited even if they graduate fewer than one-quarter of their students in four years, have little evidence of learning gains, and leave the overwhelming majority of employers lamenting the lack of skills and knowledge demonstrated by recent college graduates. It is no wonder that bipartisan support has developed over recent years for the federal "College Scorecard" with objective performance measures for colleges and universities.[12] Accreditors have abdicated their basic role—guarantor of educational quality—by relying on colleges and universities to develop their own internal assessments. As David Justice, an administrator at DePaul University, has explained: "The truth of the matter is that regional accrediting associations aren't very good about sanctioning an institution for poor quality."[13]

Anticompetitive Standards Hinder Innovation

As the price of attending a four-year college or university continues to climb, students have increasingly looked to alternative providers for their educational needs, ones that use innovative, cost-efficient models such as competency-based online courses, but are unable to receive federal financial aid because such programs are not offered at "accredited" institutions. As the landscape of what constitutes a "typical" higher education experience evolves, a regulatory regime that is exclusively controlled by those interested in maintaining a traditional (and very expensive) single university model no longer makes sense.

The growing array of educational delivery models has advanced at a pace beyond accreditors' ability to ensure an efficient and effective quality review. This regulatory system—based on inputs and now over 60 years old—is incompatible with a world that includes unbundled skills-based learning organizations, online

providers, and other alternatives that provide academic quality at a lower cost. But the sad fact is that the "same old" models that the current accreditation system demands cannot provide the access and educational value that today's students deserve. As seen elsewhere, outdated accrediting standards based on antiquated assumptions continue to limit colleges and universities from pursuing innovative initiatives that benefit students.[14]

Solution: An Alternative System

When Congress attempted to link quality assurance with peer review, it placed a disproportionate amount of regulatory authority with individuals who often have a vested interest in maintaining the status quo. Moreover, by giving accreditors "blank-check" authority, Congress enabled the same institutional insiders to prevent trustees from acting as the fiduciaries they are intended to be.

Prior to serving as a gatekeeper to federal funds, accreditation existed as a voluntary system of peer review and quality improvement—teams of faculty, generally from other institutions in the same region, visited colleges and universities to provide confidential advice. Congress sought to convert this private peer-review process into a federal gatekeeper, believing it could keep the federal government out of higher education while assuring that Title IV funds flowed only to suitable institutions.

However, the ability of accreditors to determine the "life or death" of institutions that rely on federal financial aid to survive means that they are private in name only, operating instead as powerful and coercive agents of the federal government. The system outlined in the following paragraphs would return accreditation to its original purpose—voluntary quality improvement—and would condition Title IV eligibility on audited public disclosures that empower consumers to make informed decisions.

This option, which would delink accreditation from its gatekeeping role, is similar to one recommended in 2012 by a bipartisan group of members on the National Advisory Committee on Institutional Quality and Integrity (NACIQI), and it responds to the recommendation of NACIQI in 2015 that quality assurance for Title IV be divorced from accreditation. Notably, this option resembles the process followed by publicly traded corporations that file quarterly and annual reports to the Securities and Exchange Commission. Access to federal funds would be delinked from accreditation for those institutions able to document student learning gains and would provide external certification of financial stability by an independent auditor as well as rigorous public disclosures of indicators of student success.

At the end of the day, quality assurance is designed to ensure that public monies flow to institutions that at a minimum are (1) financially stable and (2) demonstrate evidence of providing academic quality.

Schools deemed to have low financial risk (as currently determined by the Department of Education's Financial Responsibility Standards) could pay a modest fee—obviating the need for taxpayer funding—and certify that they make prominently and publicly available certain categories of disclosures, including institutional profile (e.g., student demographics, affordability factors including tuition and repayment rates, percentage of faculty with terminal degrees, and criteria for transfer) and measures of academic quality and student success (e.g., retention rates, graduation rates, and proof of learning gains using a nationally normed assessment and/or professional certification and licensure exams). Institutions would need to obtain an independent audit of their disclosures (again, similar to the system already adopted by publicly traded corporations), and false reporting would incur severe sanctions from the Department of Education.[15]

By providing this option to colleges and universities with low financial risk, the government could properly focus its efforts on institutions where taxpayer dollars are more likely at risk. Most importantly, it would free institutions to pursue needed reforms without fear of existential threat by accreditors interested in keeping parochial interests in place. Regional accreditors would no longer be directing the minutiae of how colleges and universities should be operated—instead, institutions would be open to exploring innovative delivery models. Increased competition to produce student-focused results would ensue.

A focus on empirical evidence of value added would allow institutions—particularly those that serve disadvantaged populations—to differentiate themselves in a more visible way than the binary system of quality provided by the accreditation system. Students from underserved communities would be able to identify more clearly those schools with a proven track record of student success after graduation.

Transparency-based systems of quality assurance have already worked well at the state level. The American Council of Trustees and Alumni's report, *Florida Rising*, details the efforts of higher education leaders in Florida, frustrated by the opaque system of accreditation, to provide the public with far more useful indicators of quality for the state's 12 four-year universities. The state system's board of governors now publishes an annual accountability report replete with metrics on affordability, resource allocation, and student success.[16]

Informed with these data, minority students and their families were empowered more than ever before. Florida State (FSU) and the University of Florida (UF) were two out of the four most affordable flagship campuses in the country in 2012–2013, in terms of percentage of median household income. They served 22 percent black and Hispanic students (22 percent UF, 23 percent FSU), with 40 percent of bachelor's degrees going to Pell Grant recipients (40 percent UF, 41 percent FSU). UF was, in 2010, one of four flagship institutions given "the highest marks . . . on measures of equity" serving low-income and minority students by Education Trust. The University of North Florida was one of the first institutions in the country to report publicly the results of the Educational Testing Service Proficiency Profile test of student learning outcomes, in which student learning gains in critical thinking were "well above expected."[17]

Information about the student population and actual student learning outcomes is far more important to prospective students than disputes about internal governance or desirable teaching loads. But the latter is exactly what matters more when accreditors act as gatekeepers to Title IV funds. Moving to a transparency-based system of Title IV eligibility would shift the focus of colleges and universities outward, on the areas that matter most to students.

An expedited alternative will go far to addressing the structural failings of the existing accreditation system. But it is not enough. At the same time, Congress should eliminate any explicit or implicit antitrust protection from accrediting agencies that allows them to carve up the country into monopolistic regions. To change accreditors, institutions must undergo a prohibitively burdensome process—not to mention risk jeopardizing their existing Title IV eligibility in the interim. As a result, no accrediting agency, national or specialized, even if it were so equipped, can provide any meaningful alternative to the six regional accreditors that account for the bulk of all four-year degree-granting institutions.

Finally, the "blank-check" provision in the current statute must be removed. Designed to limit the secretary of education's authority to establish criteria for accrediting agencies, it has effectively—and tragically—permitted accrediting agencies, wielding the power of the federal government, to interfere in governance and management matters, raising serious constitutional concerns. As amici in the *Association of American Railroads* case argued: "Under the Higher Education Act, Congress has granted to private accreditation agencies broad unreviewable authority to establish accreditation standards by which educational institutions' eligibility for federal funding is determined. . . . The delegation of the control of

federal educational benefits to private organizations composed largely of education industry stakeholders creates substantial constitutional problems" in light of the substantial scope of authority Congress has given them. Elimination of this provision would ensure that accreditors are focused on matters of academic quality, which are properly and historically the focus of peer review.[18]

America's colleges and universities are among the finest in the world. As they seek to meet the demands of a modern workforce and economy, it is vital that the quality assurance process modernize with them.

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Innovation and Quality Assurance in Higher Education

Michael B. Horn and Alana Dunagan

Continuing the perspective of institutions, efforts to comply with accreditation demands can encounter challenges when working within a quality assurance system that often seem out of sync with the pace of change in higher education. This chapter offers a business model analysis of how innovation is encouraged or stifled and institutional case studies that illustrate the constraints that the accreditation process can bring to innovation.

Higher education is in a time of transition. Colleges and universities are seeking—and sometimes struggling—to keep pace.

The challenges come from a number of directions: the changing population of students, evolving demands of the workplace and society into which students will enter, new frontiers in pedagogy powered by new technologies and research on learning, existing business models that are at risk from a combination of stagnant or declining revenue and escalating costs, and competition from new forms of postsecondary education that often look nothing like a traditional college or university.

As a result, many colleges and universities are seeking to pursue new strategies that, in some cases, challenge the long-held tenets of the traditional college model. But innovation in higher education can be complicated—and not just because col-

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leges and universities are complex places with many moving parts, constituencies, and purposes.

In most other sectors, when organizations see a new opportunity, they develop a plan to tackle it. They generally do not need the permission of an external party to chase the opportunity. Higher education is different. Depending on the nature of the innovation, a college or university must work closely with its accreditor to ensure that the new practice is consistent with the accreditor's quality standards. As a result, accreditation plays a major role in the innovation process for most colleges and universities.

Developed initially as a way for colleges to assure that high school graduates met acceptable standards for admission, accreditation has evolved over the past century.[1] The accreditation process currently gates access to Title IV federal funds and, for many institutions of higher education, essentially provides them with the ability to operate. Peer reviews for institutional accreditation are seen to focus more on the resources and processes of institutions than on student outcomes. Critics allege that this allows institutions with all the trappings of traditional higher education—but poor outcomes—to remain in existence.[2] They point to many case studies to bolster their claims.[3]

These accreditation failures—letting fraudulent or low-quality institutions slip through the cracks—grab headlines. But the more insidious failure of accreditation is arguably not the low-quality institutions that continue to be accredited and the risks accreditors allow institutions to take. Quite the opposite. It is the stifling effect that accreditation has on innovation at existing institutions.

Institutional accreditation has moved to focus more on outcomes in recent years,[4] but it continues to be a quality-control mechanism focused on ensuring fixed inputs. As society begins to place more emphasis on the outcomes of college—both in terms of employment and learning—and as successful new models emerge with very different inputs from a traditional college, scrutiny of the accreditation model is building.

In this chapter, we first discuss the nature of higher education business models and how innovation can (or cannot) occur within those models. We then explore the stories of educational institutions as they have tried to launch innovative practices. We profile Bellevue University and Tiffin University, schools that tried to build innovative online programs only to find themselves having run afoul of their accreditor. We also explore the story of Southern New Hampshire University, which successfully built a program, College for America, that is quite similar in certain respects to what Bellevue and Tiffin attempted. We also discuss the

experience of General Assembly, a boot camp that is not accredited and does not have access to Title IV funding.

Together, these stories illustrate that accreditation is not necessarily at odds with innovation. Accreditors can block innovation, but they can also facilitate it. Institutions, however, do not always know what their accreditor will allow them to do when they seek to innovate—or what resources they may have to expend to convince an accreditor that an innovation should be permissible. The seeming randomness casts a pall over innovation across the sector. It also stands in stark contrast to the ability of unaccredited educational institutions to innovate.

Business Models, Innovation, and Autonomy

All colleges have business models that allow them to stay afloat and operate. An organization's business model is comprised of four interdependent elements: a value proposition, resources, processes, and a profit formula, or, in the case of a nonprofit, revenue formula.[5] A college starts with a value proposition: a service that helps students or other key stakeholders make progress in their lives. To deliver on the value proposition, a college assembles a set of resources, such as faculty, staff, students, buildings, endowments, technologies, and reputations. As the college repeatedly uses its resources to deliver its value proposition, processes—habitual ways of accomplishing recurrent activities—coalesce. Soon, a revenue formula emerges as the company follows these processes to use its resources to deliver the value proposition. The revenue formula in essence determines what a college can and cannot prioritize, what sorts of dollars it must bring in to cover the cost of its resources, and so forth. It therefore in turn determines the kinds of value propositions that the business model can and cannot offer. As an organization operates, and particularly as an organization operates successfully, these four interdependent elements of the business model become quickly locked in place.

The inputs of an organization's business model define what it is capable of doing and, by extension, what it is incapable of doing. No successful organization can shape-shift effortlessly. The very factors that make an organization successful are the ones that prevent it from shifting to do something completely new. Focusing on inputs locks organizations into a set way of doing things and inhibits their ability to innovate. Conversely, focusing on outcomes encourages continuous improvement toward an overall set of goals.

Innovations that conform to an organization's business model are adopted readily. But innovations that do not conform either get rejected or, more often than

not, are co-opted, as the organization's business model modifies them to conform to the existing business model.[6]

Many of the innovations with the most promise to reduce the cost of college, improve completion, and expand access—in short, to improve outcomes—run counter to the existing business model inputs (resources, processes, and revenue formulas) of traditional colleges and universities. For example, a pure online program may have few significant facilities costs, but when it layers into a traditional university business model, it still has to take on a price point that can support the existing facilities.[7] Innovations aimed at redefining a college or university's value proposition must be insulated from its existing business model or else it will conform to the inputs of the existing business model rather than create a new one.

This lesson has been demonstrated time and again in a range of industries. One example is IBM, which was able to transition successfully into the personal computer market in the 1980s only by building an autonomous unit in Florida, far from its main headquarters in New York.[8] Companies that try to layer these innovations into their existing business models often fail. Consider the case of Nypro, a world leader in injection molding of plastics. In the 1990s, Nypro recognized that customers were shifting away from the larger orders that its business depended on, with millions of units per order, and toward much smaller orders with faster required turnarounds. In response, Nypro introduced a radically disruptive molding machine called the "Novaplast." The Novaplast could be set up to mold new orders in minutes, rather than the hours of set up required by the old machines. But Nypro found that even with this technology, orders for smaller runs were not coming in—and the innovative Novaplast machines were not even being used. Nypro realized that even though new technology was in place, the business model had not changed. Salesmen were still incented to bring in big orders rather than small ones. Plant managers still wanted big orders in order to keep overhead costs down. Going after this new market would ultimately require not just new machines but a new business model.[9]

Creating an autonomous unit is critical for a college to launch an innovation aimed at dramatically transforming its value proposition. This is important to understand because the desire to create an innovative autonomous unit figures prominently in each of the three university case studies profiled in this chapter. As for General Assembly, because it is a relatively new educational organization that is not a college, it has been able to create its educational model unencumbered by any legacy business model. In researching these case studies, we have drawn from publicly available information, correspondence and university documents, and interviews

with involved parties. Details come from interviews unless otherwise indicated. As these stories show, the organizational changes required to scale innovative ideas can run directly counter to the standards and practices of accreditation.

Bellevue University

For institutions seeking to build programs with processes and goals significantly different from their current practices, autonomous units are an indispensable organizational tool—but one that may confound an accreditation process that prioritizes keeping existing governance fixed. This was the case for Bellevue University. Founded in 1966 in Bellevue, Nebraska, with a mission of serving working adults, Bellevue has long been a leader in online programs.

In the early part of this decade, Bellevue decided to take a different approach to a familiar trifecta of challenges facing higher education: students who were not able to access brick-and-mortar classrooms, employers who were dissatisfied with the skill sets of college graduates, and a society that was groaning about the high price of college. Bellevue's president, Mary Hawkins, established an autonomous team to design a low-cost, mobile-first, competency-based educational program. The idea was to have the degree priced at $10,000.[10]

The program that emerged was called Flexxive, a competency-based, self-paced online program. Designed initially as an "all-you-can eat" model, students were charged per semester but could take as many courses as they wanted during that time.

In setting up Flexxive, Bellevue took pains to avoid running afoul of any existing rules or regulations. The leadership team flew to Chicago to meet with its accreditor, the Higher Learning Commission (HLC).[11] Specifically, the university wanted to see if it would need to pursue formal approval from HLC to be able to provide a program that was competency based.[12] Bellevue reviewed the program's elements with HLC, as well as the approach and process that had gone into constructing the program. After that meeting, and upon further review of Flexxive, HLC sent Bellevue a letter regarding its findings. In an interview, President Hawkins described that HLC had communicated that despite the competency-based spirit of the program, Flexxive actually fell outside of the technical definition of competency-based education from HLC's perspective. This meant that Bellevue did not require any additional review in order to launch and begin enrolling students. Flexxive was good to go.

Initial enrollment was small, but Flexxive showed promising signs of being able to reach exactly the sort of students Bellevue was targeting—those who were

unable to attend classes online or in person on a preset schedule. For example, a cruise ship captain was among the first hundred or so students to enroll in the program. The constraints, or, depending on one's perspective, freedoms, of the captain's job meant that he was unable to pursue education through a traditional brick-and-mortar program. Even traditional online programs were a poor fit for his needs. But during his months off, the all-you-can-eat, competency-based framework of Bellevue's online Flexxive program perfectly fit his situation. Flexxive allowed Bellevue to serve students it never could have reached before, students Bellevue felt it needed to pursue in order to meet its mission objectives.[13]

Bellevue envisioned that it could serve as a model to other institutions hoping to pursue a similar strategy. A glowing profile in *Inside Higher Ed* in May 2013 highlighted the competency-based nature of its new program but also its focus on personalizing learning for students. It noted that "an instructional team of four from Bellevue—including two faculty members, a student coach and a 'reader' who monitors and grades work—will help students as they work through course material, ensuring that they're making progress. The team will track students' performance on a daily basis . . . and will reach out to those who fall behind."[14] The article also focused on how deliberate Bellevue had been to ensure that it was coloring in the lines and had specifically designed the program to meet the requirements of its accreditors and qualifications for financial aid.

Bellevue found that the US Department of Education read its good press in a different light, however. Shortly after the article came out, President Hawkins reported that the department challenged the program on the grounds of "substantive interaction"—essentially claiming that the contact between students and professors in the Flexxive program was so limited that the courses would not qualify for financial aid. According to Bellevue, as part of its investigation, the department sent a survey to students asking who had initiated contact more: students or professors. As one would expect of essentially any college course, Bellevue stated that students reported that students tended to initiate their interactions with their professors. Bellevue's understanding was that, on that basis, the department moved to classify the program as a "correspondence" program, which disqualified it from receiving federal financial aid.

Given that its accreditor, HLC, had reviewed the program's design before it ever enrolled any students, Bellevue expected that HLC would advocate on its behalf. Instead, HLC opened an investigation of its own. When Bellevue sat down with its HLC reviewer, it found that the lines in which it had tried carefully to color had been redrawn entirely. According to Bellevue, HLC took issue with

the Flexxive program from top to bottom—starting with the autonomous team that Bellevue had created to develop the program. According to Hawkins, the reviewer, an administrator for a for-profit institution, told her: "I know what you're trying to do. IBM does it, other corporations do it, but you can't set up autonomous units in higher ed." From Bellevue's perspective, the inquiry went far beyond the Flexxive program. It appeared that HLC would require that Bellevue restructure its processes so that all 90 programs were governed and managed in the same way and followed identical approval and reporting processes. Bellevue needed to shut down Flexxive, or it would put the accreditation of the entire university at risk.

The Flexxive program is essentially dead, despite the $1 million that Bellevue invested in it and its early success in reaching students that both traditional and online programs were not reaching. Bellevue is teaching out current students and sunsetting the program.[15] Even worse—and more to the point around accreditation's impact on innovation—HLC had apparently gone much further than the Department of Education and forbidden the very structures and processes that enabled the innovation in the first place. Autonomous units enable organizations to pursue programs that would never fit into their traditional way of doing business. In Flexxive's case, the program was competency, not time, based, the pricing structure was all-you-can-eat, and the self-paced design stood in contrast to the time-fixed structure of other Bellevue degree programs. Like other innovations that require very different processes from the core programs of the organization, Flexxive could only have thrived in an autonomous unit. But from Bellevue's perspective, that was the basis of HLC's rejection of the program.

Bellevue's leadership believed that other regional accreditors had approved similar governance arrangements and programs. But switching to a more favorable regional accreditor was not an option—regional accreditors cover fixed geographic areas. And, for Bellevue, moving to a national accreditor would represent a major downward shift and disadvantage the institution in a variety of ways. Bellevue was stuck with HLC and how it makes decisions around innovative programs.

Tiffin University

Organizations seeking to engage in innovative programs sometimes find that they do not have the internal resources—including money but also expertise—to pursue the innovation successfully on their own. In these cases, partnering with outside organizations can help organizations fill in the gaps. Tiffin University, a small liberal arts college an hour's drive south of Toledo, attempted to do just that. Tiffin's 4,300 students and 400 professors constitute a sizable proportion of

the residents of tiny Tiffin, Ohio. Tiffin was founded in 1888 as a "career college," and it has remained committed to developing programs that prepare students for the workforce. Tiffin also draws inspiration from its motto, "*Sine Audacia Nullum Praemium*," which is Latin for "without risk, there is no gain." But despite Tiffin's willingness to experiment and its commitment to serving students, it has been fighting the demographic drain of population out of rural Ohio for some time. In an effort to sustain a robust business model with a shrinking population from which to draw students, Tiffin has looked outward. It has sought to partner with institutions abroad, bring in international students, and build online programs.

This bold spirit led Tiffin in 2008 to build an online college called Ivy Bridge, with the vision of serving students online in a scalable, sustainable way.[16] Ivy Bridge was an autonomous unit from Tiffin, built in partnership with Altius, an edtech start-up that education entrepreneur Paul Freedman[17] had founded. Tiffin managed Ivy Bridge's staffing as well as academic and curricular design, and Altius focused on enrollment, technology, and operations. Altius also made the capital investments necessary to launch Ivy Bridge, which Tiffin could not have afforded on its own. Given Altius's investment, it owned a majority of Ivy Bridge, but revenues were split fifty-fifty between the two organizations. Tiffin ultimately hoped to spin Ivy Bridge out into a stand-alone university.

When Ivy Bridge first opened its doors, regulators had not yet built rules and frameworks around online program management partnerships. The only regulatory requirement was disclosure, as Tiffin already had approval to conduct online programs. Tiffin's accreditor was the same as Bellevue's—HLC. Tiffin sent HLC a letter in early 2008 describing its intentions with Ivy Bridge,[18] and as the project progressed, Tiffin sent another communication to HLC describing the details of Ivy Bridge, now that the project was more developed.[19] HLC did not respond to either letter. Tiffin went through its ten-year review in 2010, and HLC's review team wrote that Ivy Bridge represented an important step forward for Tiffin, saying: "The concept of the Ivy Bridge partnership is an excellent strategic initiative. It addresses an underserved population through a strong curriculum, efficient and effective academic support, excellent instruction, and a very good portal for online delivery."[20] Indeed, the population Ivy Bridge was serving was unique: more than 90 percent were eligible for Pell Grants, more than two-thirds of them were low income, and three-quarters of students were over 25.[21] Innovation was allowing Tiffin to reach students it never could have reached before. Ivy Bridge looked poised for success, and it appeared ready to take its first steps toward becoming an independent accredited institution.

Given Altius's location in California, Altius and Tiffin intended to seek accreditation for Ivy Bridge through the Western Association of Schools and Colleges (WASC), which had experience with similar programs.[22] In December 2011, they notified HLC of the path down which they intended to proceed. But the political winds had shifted. Where regulators had previously been focused on increasing access to college, now they were looking through the lens of the subprime meltdown—and a fear that bad actors in the student loan and for-profit college markets could be planting the seeds of the next debt crisis.[23] The people at HLC had changed since Tiffin's positive ten-year review as well. And even though the new staff hadn't been directly involved, the fact remained that HLC had accredited many of the major for-profit players, including Bridgepoint, Grand Canyon, and the University of Phoenix, many of which Senator Tom Harkin's Health, Education, Labor and Pensions (HELP) Committee was investigating and publicly excoriating. Ivy Bridge saw its standing with HLC shift 180 degrees.

HLC wrote back at the end of February 2012 and notified Tiffin that it viewed the action to seek independent accreditation for Ivy Bridge as a "change of control," which required additional procedures. It also said that in HLC's new, clarified view, despite prior review by HLC, the Ivy Bridge venture had never been properly accredited. HLC now believed that Ivy Bridge represented "a transfer of a substantial portion of the HLC accredited institution, Tiffin, to another entity,"[24] in reference to Altius. Tiffin tried to clarify the Ivy Bridge relationship to HLC. It emphasized that it had retained academic control over the online programs.[25] HLC responded again, this time providing Tiffin with a catch-22. It was concerned on the one hand that Ivy Bridge was an autonomous unit, meaning that Tiffin didn't have control. On the other hand, it was worried that Ivy Bridge was deeply embedded with Tiffin, and that if Ivy Bridge began to function as a stand-alone institution, Tiffin would not be able to function without it.[26]

Tiffin and Altius had never expected such a reaction from HLC. During the ten-year review, HLC was positive about Ivy Bridge, and prior communications about Ivy Bridge had not even merited a response from HLC. Tiffin and Altius decided to delay their plans to seek independent accreditation. They instead focused on getting HLC's new leadership comfortable with Ivy Bridge. Their efforts were unsuccessful.

HLC conducted a new review of Ivy Bridge. The results were punishing.[27] HLC viewed the financial success of the endeavor as evidence that Tiffin had bartered its accreditation for financial gain.[28] Whereas HLC's ten-year review had found the Ivy Bridge academic program to be a "strong curriculum," the change of control

review found that the quality of the courses was so poor they were "inappropriate for higher education."[29] HLC gave no explanation for the change in its findings. It also took issue with student performance at Ivy Bridge. Retention was lower in the online program than on the main campus—as one might expect, given that the main campus students consisted of an economically diverse group of full-time, first-time freshmen, and the Ivy Bridge students were mainly adult learners living in poverty. The review team seemed to conclude that Tiffin's relationship with Ivy Bridge was rotten from top to bottom, and that Ivy Bridge could not be included in Tiffin's accreditation. Ivy Bridge would have to be shut down immediately.

Tiffin felt that it had no choice but to comply, as to disobey HLC would mean its own accreditation—and ability to operate—would be at risk. And it saw no way to appeal HLC's decision. Innovations often require new capabilities, and partnering with another organization to help build those capabilities can be a smart choice. But in this case, Tiffin was blocked from doing so. HLC's concerns about the business model ultimately outweighed its prior assessment of Ivy Bridge's strong outcomes.

Southern New Hampshire University's College for America

College for America (CfA), which Southern New Hampshire University (SNHU) launched, has emerged as a poster child for postsecondary competency-based education. CfA's students can earn associate's or bachelor's degrees in fields ranging from communications to health care management. Its programs are competency based, self-paced, online, and all-you-can-eat—at just $3,000 per year. If that sounds similar to Bellevue's Flexxive program, it is. But SNHU has enjoyed a very different experience with its accreditor.

SNHU is a private school. Its president, Paul LeBlanc, has overseen stunning growth during his tenure. Enrollment has skyrocketed from 2,500 students to more than 80,000 today—most of whom learn online. SNHU's journey toward becoming one of the most significant players in online education began initially as a strategy to fight declining enrollment. LeBlanc has not only been a leader in innovation but has also built strong relationships in the traditional structures of higher education. He has served on the accrediting commission for the New England Association of Schools and Colleges (NEASC); the National Advisory Committee on Institutional Quality and Integrity (NACIQI); and a three-month post at the Department of Education, where he helped design the Educational Quality through Innovative Partnerships program (he also authored one of the chapters in this edited volume). This wealth of experience has helped LeBlanc

shepherd innovative ideas through traditional regulatory and accreditation structures; SNHU was the first in the country to have an accredited competency-based program untethered to the credit hour and eligible for Title IV funding.

When SNHU set out to create CfA, it took a few important first steps. First, just as he had when he created Southern New Hampshire Online, LeBlanc created an autonomous unit to develop CfA—just as Bellevue had attempted with its Flexxive program and Tiffin had with Ivy Bridge. Second, SNHU brought its accreditor, NEASC, into the conversations about CfA early.[30] Barbara Brittingham, the president of NEASC's Commission on Institutions of Higher Education, came to campus and was able to meet with several of the staff members working on CfA. Although NEASC had not previously worked with any competency-based programs, these conversations allowed her to become familiar with CfA's mission and purpose. LeBlanc and Brittingham brainstormed how to best design the program to address the regulatory requirements of the direct assessment approach in Title IV, and how to best present the program to the commission.

Typically, NEASC commission meetings involve thousands of pages of material, an incredible amount of information and detail for commissioners to digest. Creating a good proposal—one that is organized and addresses proactively the questions the commissioners are likely to have—can be critical.

According to SNHU leadership and Brittingham, when the commission met to review SNHU's CfA proposal, it spent an afternoon session diving into both the concepts of competency-based education and the specifics behind what CfA would look like. The commission had several questions about CfA's approach. It wanted to know how the curriculum would work and how the program would compare to a more traditional approach. Fortunately, SNHU had included that information in its proposal. The commission also sought to understand more about the role of faculty and who exactly was in charge of the new program. Again, CfA had answers; the commission was impressed with the staff that SNHU had brought in to lead the program, and the proposal more than adequately addressed faculty involvement in CfA. Lastly, as with any new program, the commission focused on its financial stability. Again, SNHU addressed its concerns, as it raised significant outside money to create capacity for CfA.[31] By all accounts, the CfA proposal was thoughtful, complete, and incredibly well written.[32]

As a result, the commissioners grew quickly comfortable with the program's financial profile. A month after its September 2012 meeting, NEASC approved SNHU's proposal to create CfA. SNHU then worked through the Department of Education's process so that CfA could be eligible for Title IV funds. It was ap-

proved in the spring of 2013—just months before Ivy Bridge was unceremoniously shut down. Three years later, CfA is growing quickly, has graduated more than 700 students, and currently has 5,000 students enrolled.[33] It continues to enjoy rave reviews, and, unlike Bellevue's Flexxive, it has had no challenging interactions with its accreditor. It has been able to operate as an autonomous unit and has been praised for how innovative it is and how shrewdly it has set up its organization to be capable of being so innovative.

SNHU employed the tools of innovation to great success with CfA. In partnership with NEASC, SNHU was able to build an autonomous unit to build CfA. SNHU also thought deeply about who CfA would serve and how it would do so, and designed a program with very different characteristics from SNHU's traditional offerings. CfA required that resources be deployed in new ways and accordingly carved out new roles for faculty and supporting staff. NEASC in turn was thoughtful about the needs of the new program and allowed SNHU to be flexible with the inputs required in CfA's design. NEASC gave SNHU's efforts significant scrutiny but was analytical and outcomes oriented in applying its standards to the CfA program.

General Assembly

Innovation in higher education is happening outside of traditional, accredited institutions as well. New York–based General Assembly is famed for its coding boot camps—brief, intensive programs focused on skill development. The company describes itself as an education and employment company, and it has expanded to 25 campuses in six continents since its founding in 2011. General Assembly builds programs that offer students a high return on their investment in fields with strong demand for new workers. Often, these areas are in emerging fields driven by new technologies or coding languages where explosive industry growth requires more workers more quickly than traditional institutions can produce. So far, 33,000 have graduated from General Assembly's programs.

General Assembly, along with the rest of the boot camp sector, has grown without pursuing traditional accreditation.

That doesn't mean that boot camps are unregulated. General Assembly is licensed in the states in which it operates, for example, with California's Bureau for Private Postsecondary Education, or with Illinois's Board of Higher Education. These agencies typically require that it meet certain standards as an educational provider, such as the training and background of its teachers and, theoretically at least, other consumer protection clauses. As an unaccredited entity that does not provide traditional degrees, General Assembly does not qualify for Title IV

funds. But that has not stopped its growth. Nor has being unaccredited prevented it from demonstrating to students and employers that it is a high-quality, reputable provider. The company is involved in an open-source project to help students and other stakeholders understand the value of different boot camp programs and to differentiate between them. It also has staffers assigned to building relationships with employers and helping them understand the value and abilities of its graduates.[34] General Assembly's students need to be convinced that there will be a return on their tuition—generally in the form of a well-paying job—before they are willing to enroll.

In a way, operating outside of the traditional higher education system is part of what has made General Assembly successful. General Assembly relies heavily on partnerships with industry and industry practitioners to build out the curriculum for its programs and to define the learning objectives necessary for a worker to be successful. These industry practitioners often do not fit the definition of faculty that accreditors might require, but they are often the world experts in emerging fields of work.[35] And General Assembly needs to be able to create these programs rapidly to foster and maintain positive relationships with employers, so that their students will have access to good jobs, by keeping up with their evolving demands. Having to work with an accreditor every time it wanted to create a new, innovative program that deviated from its prior educational models with a risk that the accreditor might not approve the program would create delays—some of which would, arguably, be unacceptable for General Assembly's model. Additionally, not every program that any boot camp launches is always successful from the get-go; innovation almost always involves iteration until an idea turns into a fully functioning reality. Spending resources on justifying an early-stage program before it has been in the marketplace and proved itself in reality—not in theory—may hamper the odds of success.

General Assembly's leadership team has been vocal that accreditation—with its bureaucracy and, in their opinion, attention to the wrong, input-driven details—would be a poor fit for the boot camp provider.[36] Instead of having quality mandated by an external provider, competition forces General Assembly to be high quality. General Assembly can only be successful in the long term if its graduates are able to find jobs that compensate them for their investments in a General Assembly education. In turn, General Assembly graduates will only be able to find those jobs if General Assembly remains continually focused on aligning its programs and curriculum with the needs of employers. For boot camps, competition is an outcomes-focused game, and so is quality.

Takeaways

Why were SNHU's efforts to build a competency-based program successful, whereas Bellevue's attempt to build a similar program was ultimately blocked? What are we to make of the fact that Tiffin's Ivy Bridge venture was initially supported by its accreditors but ultimately struck down? How can institutions restructure their organizations to improve outcomes when common interpretations of accreditation standards require that inputs remain fixed? What could it look like if—in part because of the limits of accreditation—innovation in higher education happens outside of traditional institutions instead of within them?

Rules Inconsistently Applied

An obvious takeaway is that accreditation as it currently stands is inconsistent, both between accreditors and between the same accreditor at different points in time. The standards of accreditation vary between accreditors, but their interpretation varies to an even larger degree—even between different accrediting teams looking at the same institution. This creates big uncertainties for institutional leaders and creates untenable risks for many schools with limited resources that are considering whether to bring innovative programs forward. Many institutions do not feel they can afford the financial and reputational losses involved in being a Tiffin or a Bellevue, and institutions do not want to take the risk of having their accreditation revoked. Institutions that are able to innovate are those blessed by geography (a cooperative, forward-thinking regional accreditor) as well as finances. Innovation can be expensive, especially when it is shut down midstream. And those institutions that arguably need to innovate the most are often those that are not swimming in resources.

The story of CfA illustrates that innovation can thrive under traditional accreditation. But the fact that CfA could innovate whereas Bellevue could not—and Tiffin could but then all of a sudden could not—leaves a pause in arriving at that conclusion and certainly should cause institutions considering innovating to pause as well. One could look at the stories in this chapter and conclude that accreditation is not at odds with innovation; rather, perhaps particular accreditors are. But a process that is so subject to individual interpretation and has a track record of inconsistently applying rules and standards cannot be a foundation for regulation supportive of innovation. As countless scholars have shown, investment in innovation does not thrive in climates of uncertainty.

Input-Driven Standards Stifle Business Model Innovation

Accreditation has often been criticized for being "input driven." Institutional accreditors look at an institution's mission statement, planning practices, governance structure, academic oversight, and student policies, all of which are inputs to education, not outcomes of it. Even standards like "educational effectiveness," which purport to focus on outcomes, actually only require institutions to study and consider whether the institution is effective; the institution is not held accountable for meeting any specific outcomes.

Even worse, the focus on inputs makes it challenging for institutions to change their business models. It is challenging, if not impossible, to innovate and create a healthier dinner without changing any of the ingredients. If accreditors have the ability to bar institutions from creating new, autonomous organizational structures with vastly different ingredients, then that will, by definition, inhibit innovation.

New Value Networks Emerging

In part because of the limitations of the accreditation model, much of the meaningful innovation in higher education is happening outside traditional institutions of higher learning. This pattern has played out in other industries; when regulation limits innovation, new players find ways to prove themselves outside the system. For example, Southwest Airlines was able to disrupt the airline industry in the 1970s by operating beyond the reach of the Civil Aeronautics Board, which had heavily regulated pricing and routes for interstate travel. By flying short routes within the state of Texas at very low prices, Southwest developed a new market by serving people who previously could not afford to travel by airline. It managed to keep prices low by operating outside of regulations; by 1978, however, it had become clear that the safety measures of discount airlines were just as good as higher-priced incumbents, and the Civil Aeronautics Board deregulated the airline industry.

As illustrated in the story of General Assembly, a new set of education providers is emerging, ranging from those offering online microcredentials to boot camps that provide students with the skills they need at a fraction of the time and money. Because they are unaccredited, students seeking to pursue education from these providers are unable to access the federal financial aid system. But rather than halting innovation, this has led entrepreneurs to seek nontraditional sources of funding, to develop innovative business models, and to keep costs as

low as possible and return on investment high. As these ventures proliferate, new entities are emerging to provide transparency and assessments of quality in that marketplace. As innovation takes place outside of traditional institutions, new value networks are developing, including new education providers, new sources of capital, and new value propositions for students and employers.

It Is Not Just Accreditation

It is worth noting that accreditation is not the only structure limiting innovation at colleges and universities. As the Bellevue story illustrates, innovators in higher education also contend with an outdated Higher Education Act, Department of Education rules designed for a pre-Internet era, and a financial aid system that measures itself by time spent in a seat rather than what is learned. Accreditation practices are embedded in, and shaped by, a complex architecture of regulations that stymies innovation—and yet has also failed to consistently protect students, limit costs, or create industry transparency.

Conclusion

The forces of disruption are pressing down on higher education, and many college and university leaders have the passion and drive to adapt to a changing environment. But innovation is never such a neat process; no idea ever pops out of someone's head fully formed or perfect. Allowing colleges to try something and then iterate is critical for innovation to flourish. But too often, they find their efforts to rethink outmoded practices and programs are stymied by the very entities that were originally designed to promote quality in higher education—even as new entrants to the market are able to innovate without the constraints of accreditation. Instead of promoting quality, accreditation is in some cases consigning institutions to merely preserve the status quo.

Instead, an accreditation system should be developed that is supportive of innovation, and that limits bad actors through a focus on outcomes. The fact that an external body has the ability to block an innovation—whether it be tried-and-tested or still half-baked—creates a barrier to innovation. Some might argue that it should bolster innovation because it forces institutions to be more thoughtful in advance of what they are trying to do and make their case to an empathetic but skeptical jury of peers. But many colleges likely never get to this step because of the specter of justifying what they are trying to do to an external entity.

The calculus of balancing the costs and benefits of the traditional accreditation model is shifting. Successful innovation requires that institutions rethink those four interrelated components of their business model, including their governance processes and organizational structures, in order to enable new ideas to flourish. The input-driven design of accreditation prioritizes keeping processes and structures fixed, ostensibly as a signal of institutional quality. But the costs of limiting innovation are rising, as pressures mount on the traditional business model. Simultaneously, the purported benefits of the current accreditation model—namely, that it will protect students and the federal government from poor ideas or bad actors in the postsecondary education ecosystem—have in many cases proven not to be true.

NOTES

1. A summary of the changes that accreditation has gone through can be found in an issue paper for the Department of Education, written by Vickie Schray, which describes the historical evolution of accreditation through the lenses of accountability, pressure on higher education business models, and the development of new delivery technologies and modalities. See Vickie Schray, "Assuring Quality in Higher Education: Key Issues and Questions for Changing Accreditation in the United States," The Secretary of Education's Commission on the Future of Higher Education, accessed October 2, 2016, https://www2.ed.gov/about/bdscomm/list/hiedfuture/reports/schray.pdf.

2. In 2012, 454 colleges reported six-year graduation rates below 30 percent. All of them were accredited. See Kevin Carey, Testimony before Congress, the Committee on Education and the Workforce, Hearing on "Keeping College within Reach: Discussing Program Quality through Accreditation," June 13, 2013, http://docplayer.net/11099322-Written-statement-of-kevin-carey-director-education-policy-program-new-america-foundation-before-the.html.

3. A *Wall Street Journal* analysis of colleges that have lost their accreditation noted "nearly 350 out of more than 1,500 four-year colleges now accredited by one of six regional commissions have a lower graduation rate or higher student-loan default rate than the average among the colleges that were banished by the same accreditors since 2000." See Andrea Fuller and Douglas Belkin, "The Watchdogs of College Accreditation Rarely Bite," *Wall Street Journal*, June 17, 2015, http://www.wsj.com/articles/the-watchdogs-of-college-education-rarely-bite-1434594602. Searchable analysis available at: http://graphics.wsj.com/accredit-2015/.

4. Schray writes on the pressure for evolution of accreditation standards: "Recently, federal and state policymakers have called for accreditation to require accredited higher education institutions and programs to report valid and reliable information on their performance to the general public." This public pressure to focus on outcomes has had some impact on the practices of accreditors. Schray notes, "The federal government and ac-

creditation organizations have taken some steps to address many of these criticisms of higher education and the accreditation system. The federal government and accreditation organizations now make explicit reference to performance outcomes or measures of institutional effectiveness in their quality standards. Many accreditation organizations also make explicit reference to providing information on institutional effectiveness to the general public. Some accreditation organizations, especially those driven by professional licensure, have moved to "outcome-based accreditation." Other accreditation organizations have held forums and workshops on how to balance the emphasis on resources, processes, and outcomes in accreditation decisions and how to improve evidence of student learning." See Schray, "Assuring Quality in Higher Education."

5. Clayton M. Christensen, *The Innovator's Solution: Creating and Sustaining Successful Growth* (Boston: Harvard Business Review Press, 2003), 178.

6. Ibid., 202. One of many historical examples discussed in *The Innovator's Solution* is that of Woolco. Woolco was the autonomous and independent discount department store arm of FW Woolworth. At first it did well at a lower average gross margin and higher turn of inventory per year. Then "Woolworth's corporate executives decided to integrate the management, buying, and logistics of Woolco back into the mainstream of Woolworth in order to leverage [the] fixed costs." The result was that the mainstream business forced the Woolco average margins up, which in turn drove down inventory turnover. This meant that Woolco mirrored the model of Woolworth, but having lost its niche in the marketplace, Woolco subsequently closed down.

7. Russell Poulin and Terri Taylor Straut, *WCET Distance Education Price and Cost Report* (Boulder, CO: WICHE Cooperative for Educational Technologies, 2017).

8. Christensen, *The Innovator's Solution*, 190.

9. Clayton M. Christensen, Michael B. Horn, and Curtis W. Johnson, *Disrupting Class: How Disruptive Innovation Will Change the Way the World Learns* (New York: McGraw-Hill, 2008), 76–77.

10. Mary Hawkins (Bellevue University president) in discussion with Michael Horn and Alana Dunagan, August 23, 2016.

11. Staff from the Higher Learning Commission declined to be interviewed for this chapter.

12. Mary Hawkins (Bellevue University president) in discussion with Michael Horn and Alana Dunagan, August 23, 2016.

13. Ibid.

14. Paul Fain, "Rise of Customized Learning," *Inside Higher Ed*, March 15, 2013. https://www.insidehighered.com/news/2013/03/05/competency-based-education-continues-spread.

15. Mary Hawkins (Bellevue University president) in discussion with Michael Horn and Alana Dunagan, August 23, 2016.

16. Paul Freedman (former Altius CEO) in discussion with Michael Horn and Alana Dunagan, September 6, 2016.

17. Michael Horn, the coauthor of this chapter, works with Paul Freedman, the former CEO of Altius, at a new venture, Entangled Ventures. Michael Horn had no business interest in or relationship with Altius.

18. Tiffin University president Paul Marion, letter to HLC executive director Steven Crowe, January 18, 2008.

19. Tiffin University president Paul Marion, letter to HLC vice president for accreditation relations John Taylor, June 15, 2009.

20. "Ten-Year Review of Tiffin University," Higher Learning Commission, 2010, 28.

21. Data as of March 2013. From internal Tiffin University documents.

22. Tiffin University president Paul Marion, letter to HLC vice president for accreditation relations John Taylor, December 2, 2011.

23. A 2010 article in *Inside Higher Ed* ahead of congressional hearings on for-profit colleges describes the political climate at the time: "Education Secretary Arne Duncan and other Obama administration officials have often sought to characterize their probing of the for-profit sector as aimed at identifying 'bad actors' and as part of a search for new measures of 'value' for postsecondary institutions of all types, be they public, independent or corporate. But the rhetoric and activity coming from Congress has thus far been harsher, suggesting skepticism among lawmakers in both chambers and on both sides of the aisle about the behavior of—and appropriate role in higher education for—private sector colleges. The intensity of the language and the assertions of systemic problems recall for some observers the last period of broad-based and aggressive scrutiny of for-profit higher education, a set of hearings that led to major revisions of the Higher Education Act in 1992." See Jennifer Epstein, "'Bad Apples' or Something More?" *Inside Higher Ed*, June 24, 2010, https://www.insidehighered.com/news/2010/06/24/forprofit.

24. HLC president Sylvia Manning, letter to Tiffin University president Paul Marion, February 27, 2012.

25. Tiffin University president Paul Marion, letter to HLC president Sylvia Manning, March 12, 2012.

26. HLC president Sylvia Manning, letter to Tiffin University president Paul Marion, June 1, 2012.

27. Additional publicly available information is available in Paul Fain's review of Ivy Bridge's closure in *Inside Higher Ed*. See Paul Fain, "Setting Limits for Outsourcing Online," *Inside Higher Ed*, August 5, 2013, https://www.insidehighered.com/news/2013/08/05/tiffin-u-drops-ivy-bridge-college-partnership-altius-over-accreditors-concerns.

28. "Staff Summary Report to the Board of Trustees for Change of Control, Structure, or Organization for Tiffin University," Higher Learning Commission, May 22, 2013, 3, 29.

29. Ibid., 4.

30. Paul LeBlanc (SNHU president) in discussion with Michael Horn and Alana Dunagan, September 9, 2016.

31. Details of the commission's views from Barbara Brittingham (NEASC president) in discussion with Michael Horn and Alana Dunagan, October 4, 2016.

32. Paul LeBlanc (SNHU president) in discussion with Michael Horn and Alana Dunagan, September 9, 2016; Barbara Brittingham (NEASC president) in discussion with Michael Horn and Alana Dunagan, October 4, 2016.

33. Data from Sabrina Manville (CfA's head of marketing and strategy) provided to Michael Horn and Alana Dunagan, October 6, 2016.

34. Liz Simon (General Assembly's vice president of legal and external affairs) in discussion with Michael Horn and Alana Dunagan, September 16, 2016.
35. Ibid.
36. Ibid.

Regulatory Experimentation, Accreditation, and Innovation

EQUIP as a Blueprint for the Future of Higher Education

Paul J. LeBlanc

In response to some of the limitations of accreditation in being able to accommodate innovation, the US Department of Education launched an experiment for accreditation via partnerships for programs not housed in an institution of higher education. The rationale for this experiment, and its potential impact on the larger field of accreditation, are outlined here.

On October 15, 2015, the US Department of Education launched the Educational Quality through Innovative Partnerships (EQUIP) experiment. EQUIP uses the secretary of education's authority to waive certain Higher Education Act (HEA) Title IV rules to explore new ideas in financial aid. While originally intended to test tweaks in the federal financial aid system, the Obama administration used the experimental site authority to create safe spaces to test even bolder ideas, such as competency-based education. In this case, EQUIP does something even more radical: it provides, for the first time, a pathway to Title IV aid for students enrolled in programs not offered by approved institutions of higher education (IHEs). Less discussed, but arguably as important, it seeks to stand up new forms of quality assurance and approaches to accreditation. The Department of Education has given initial approval to eight EQUIP sites,[1] providing a useful glimpse into the future of higher education and accreditation.[2] The Trump administration has indicated that it will continue to support EQUIP, even as it ends some other experimental sites.

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Why Is EQUIP Important?

Perhaps because the number of approved proposals would be modest in number, and because the nature of EQUIP invites a wonkish dive into policy, it has not received the kind of attention it deserves. For the first time, EQUIP will allow federal financial aid dollars to support students enrolled in programs offered by providers that are not colleges or universities. This would allow coding boot camps, massive open online course (MOOC) providers, museum programs, and others to serve low-income students who might not otherwise be able to afford their price. In the case of coding boot camps, the darlings of many innovation-minded policymakers, students can enroll in intensive 15-week programs to become full-stack web developers and have multiple job offers with starting salaries in the $75,000 range. At a cost of approximately $15,000 (they range, of course), such programs have been out of reach of most low-income students. In EQUIP, a coding boot camp can now partner with an IHE, through which the federal financial aid dollars flow, and low-income students can access Pell Grants and other federal aid to pay for that education.

In originally designing EQUIP, the wish was to approve non-IHE providers under Title IV, but being approved for dispersal of Title IV funds actually happens under Title I of the HEA, and there is no authority for the secretary to waive Title I rules. The way around that limitation was to allow non-IHEs to partner with a Title I–approved IHE to offer the whole of its program. That last phrase is important (I told you this would get a bit wonky). Current Title IV rules allow an IHE to contract with an outside provider to offer 25 percent of that provider's program without any special approval or 50 percent with accreditor approval. The remainder of the program had to be offered by the IHE for enrolled students to be eligible for Title IV aid. EQUIP waives the 50 percent cap and allows the whole of an outside program to be offered under the umbrella of the IHE's Title IV approval. There are other smaller details, but the only one of real note is that the program must be equivalent to 12 credit hours of study, essentially a body of learning no smaller than a semester's worth of college work.

There are many reasons why these provisions of EQUIP may be profoundly important. First, it offers recognition of what is essentially a microcredential, a coherent program of study and a credential less than a degree. For those working on models of microcredentials, badges, and more granular forms of learning than traditional degrees, EQUIP offers a policy and financial aid framework to accommodate them. Second, EQUIP allows nonnative species into the Title IV

ecosystem, and if the analogy portends the possible, they may forever change that ecosystem. With reauthorization of the HEA gearing up on Capitol Hill, the models created within EQUIP and the role of non-IHEs (and the competition they can come to provide) might come to be embodied in new legislation. Remember the impact of lifting the 50 percent cap on virtual learning in 2005 (which similarly started as an experiment in 1999 through a demonstration project), a policy change that resulted in the subsequent explosion of online learning and the growth of the for-profit sector. A legislative change based on EQUIP could have a similarly significant impact on higher education. Finally, and most important to this discussion, EQUIP recognizes that traditional accreditation is ill-equipped to evaluate new innovative non-IHE providers and calls for new approaches to quality assurance. This final point is of most importance to the topic of this chapter and book.

EQUIP and Accreditation

EQUIP was announced in the October 15, 2015, *Federal Register*, and the section on accreditation reads: "As part of this experiment, the Department is interested in understanding how a QAE will determine the quality of a program of study through a set of largely outcome-based questions, rigorous and timely monitoring, and accountability processes." A QAE here means quality assurance entity, since the program seeks to stand up alternatives to the existing accreditors (though there was always some hope that a regional accreditor might take up the challenge), and the most important aspect of the aforementioned passage is the focus on *outcomes-based questions* instead of a focus on inputs. That shift in focus from prescriptive quality assurance to outcomes-based quality assurance is important.

Accreditation has long been a faith-based initiative. That is, as a nation, we have mostly operated on faith that if we had all the right inputs—enough volumes in the library, PhDs on the faculty, students with high enough SAT scores, a strong faculty voice in governance—then we could have faith in the quality of higher education and the graduates produced. Indeed, some accreditors became quite prescriptive in defining the "inputs" they deemed necessary to ensure quality, with specialized accreditors defining class size limits and even the levels of research and scholarship expected of faculty. For many decades, that approach to quality assurance seemed to work well enough, in that a college degree seemed a reliable signal to the world and the labor market that its possessor had higher-order skills, that they could write, present, do math, think critically, and would have some broad cultural knowledge. A college degree mostly resulted in a good job, and everyone was happy.

Today, everything has changed. American higher education is encountering a perfect storm, including:

- Serious doubts about its quality, whether from critiques like 2010's *Academically Adrift*[3] or research like the 2014 Gallup survey[4] in which only 11 percent of employers believed graduates were workforce ready compared to another 2014 survey from *Inside Higher Ed*[5] that found 96 percent of chief academic officers believed their graduates were workforce ready.
- Serious doubts about its value, as graduates carry ever-higher levels of debt and have less confidence about landing a good-paying job post Great Recession and in a world of increasing automation and artificial intelligence.
- The collapse of the for-profit sector, many of the failing schools and chains remaining in good standing with their accreditors, even as they were being shuttered or engaging in abuse, and subsequently costing hundreds of millions of taxpayer dollars in loan forgiveness.
- The underlying business models of many institutions under severe stress, whether from per-student state divestment, in the case of public institutions,[6] or declining net student revenues among nonselective privates.[7]
- The need for new innovative delivery models that can deliver higher quality at lower prices.

While myriad factors contribute to this unhappy drama and finger-pointing abounds, accreditation has been a primary target for criticism. Accreditors are frequently in a bind. On the one hand, they are criticized for setting the quality bar too low, allowing very poor-quality providers to continue operating, and lacking the transparency that might help consumers of education make better choices. On the other hand, they are accused of stifling innovation, overregulation, and protecting the monopoly-like hold of nonprofit higher education over the industry.

The Department of Education has been critical of accreditors, with then secretary of education Arne Duncan calling them "watchdogs that don't bite" when releasing a 2015 package of executive actions[8] that forced accreditors to be more transparent about their standards and their actions with noncompliant institutions. The National Advisory Committee on Institutional Quality and Integrity (NACIQI), the body that oversees accreditors and makes recognition recommendations to the secretary, launched a pilot on the use of student outcomes data in

agency reviews. In the pilot, started in June 2016, NACIQI is now being asked to consider outputs data, including:

- percentage of Pell eligible,
- percentage of Pell completers,
- graduation rates (as appropriate, the three-, four-, and six-year completion metric),
- debt incurred by students graduating from the accredited programs/institutions, and
- repayment and default rates of the students graduating from the accredited programs/institutions.

Agencies are being asked about benchmark data, cutoff figures, and minimum standards, and how agencies use these data in their institutional reviews. The pressure on accreditors is to add more emphasis to outcomes.

EQUIP goes dramatically further, making outcomes the primary framework for assessing quality. In developing EQUIP, the department eschewed inputs almost entirely and focused on two key questions every institution, every program, should be able to answer: What claims do you make for your graduates? How do you know they know and can do what you claim? On the surface, these seem simple enough. Yet when unpacked, most IHEs do a poor job on both counts. To their credit, accreditors have, for some years, demanded greater clarity around student outcomes. But rarely do they drill down into the claims question the way EQUIP seeks to do.

Since most people do not read the *Federal Register* and the press coverage of EQUIP was limited and spent little time on the details, it is useful to provide (see table 7.1) the full text of what is being asked in this new approach to quality.

There is an additional fourth area, not included in the previous discussion, having to do with general management of the QAE and not really relevant to the question of assessing quality. Taken together, the three sections discussed previously represent a radically and rigorously different approach to assessing institutional quality. Indeed, one might ask how many traditional IHEs could stand up to this kind of scrutiny today.

The EQUIP approach to quality assurance addresses most of the primary criticisms leveled at accreditors today. While recognizing that accreditors have, for some years, put more emphasis on clearly stated learning outcomes, the EQUIP section on claims would force providers to think even harder about what their graduates will know and *what they can do* to be transparent about those claims.

While that section alone does not necessarily force a better alignment of outcomes with workforce needs, something many assert is needed, taken together with the outcome section in the third part of the EQUIP approach to quality, there would almost certainly be more provider care to make sure the programs they produce have workforce value. The section on assessment—getting to the "How do you know?" question—would address an area of genuine need in higher education, the sorry state of much assessment and the growing concern that the claims IHEs make cannot be trusted. The final section would shine a light on poor institutional performance around hot topic issues such as completion rates, student debt and earnings, and workforce alignment.

For those who claim that accreditation stifles innovation, the EQUIP approach refreshingly ignores inputs, essentially saying in effect that as long as we can know what is claimed, measure it, and see the results, we really do not care how one designs a program. Student achievement and success is what matters here and the traditional inputs—often tied to markers of status, expense, and untested claims of quality—matter very little. That approach can spur innovation, since program design is unfettered with prescriptive demands, while holding providers accountable for results.

Programs versus Institutions

Another important aspect of EQUIP is its focus on *program* quality instead of institutional quality. The typical gateway to federal financial aid is through *institutional* accreditation, a top-to-bottom look at an organization that has traditionally included standards around mission, governance, academics, student services, faculty, finances, and the like. Generally, institutions have been vertically integrated, managing the whole of the student life cycle from recruitment to alumni relations. We are now seeing what Ryan Craig calls the "great unbundling" of higher education.[9] Historically, institutions came to "unbundle" functions that could be offered less expensively and/or better by others and that were not core to the academic mission. So food service companies came to replace institutionally run dining halls, maintenance companies might take over some or all of campus maintenance, marketing firms created recruitment materials, and so on. These functions were seen as ancillary to the institutions' core activities, and there was little to no impact on the academic program.

The pervasive use of technology has come to blur the boundaries of what was core and ancillary activity within institutions. For example, adoption of learning management systems had an inherent shaping force on educational delivery,

Table 7.1. EQUIP Approach to Quality

A. Claims for Learning
   1. What measurable claims is the institution making about the learning outcomes of students participating in the program? For example:
      - What is the evidence that the learning claims are commensurate with postsecondary- or post-baccalaureate-level work?
      - Do the institution's statements about student outcomes capture requisite knowledge and skills? How?
   2. How are the value and relevance of those claims established? For example, what external stakeholders have been consulted to verify the value and relevance of the claims?
   3. How will the claims be measured?
   4. How will institutions be held accountable for meeting those claims?
   5. How do all the claims for learning come together into a meaningful and coherent set of overall program outcomes and goals?

B. Assessments and Student Work
   1. How does the institution assess whether students enrolled in the program can meet the claims outlined in Section A? For example:
      - How are assessments aligned with the specific tasks, expectations, and contexts for which programs claim to be preparing students?
      - Beyond one-time assessments, is student work reviewed as part of the assessment of student learning and program outcomes? Do external stakeholders review students' work? How are examples of student work made available to outside parties (with appropriate privacy and other protections)?
   2. How has the reliability of these assessments been established?
   3. How has the validity of these assessments been established, for example, in terms of the following?
      - Face validity: Does the assessment appear to measure what it says it measures?
      - Content validity: Does the assessment accurately measure the knowledge and skills covered by the program?
      - Predictive validity: Does the assessment accurately predict the student's ability to demonstrate a given competency in the future?

enabling and constraining what was possible. Publishers invested heavily in textbook ancillaries, broadening the resources that could be used in teaching. When the aforementioned 50 percent rule—the regulation that dictated that 50 percent of courses had to be delivered on campus—was lifted by waiver in 1999 and then removed completely in 2005 through the Higher Education Reconciliation Act, online learning exploded, first among for-profits and then, more recently, among nonprofits. Technology and connectivity was what enabled that growth.

More recently, nonprofits have often struggled to launch online programs, and their challenges gave rise to a new for-profit sector within higher education that can provide services ranging from recruitment to advising to course development to general program management, splitting revenues with the client institutions. In

- Concurrent validity: Does the assessment correlate with other measures of the desired performance meant to be assessed?

4. How and how often does the QAE review these assessments?

C. Outputs, Which, Where Applicable, Must Be Disaggregated to Show Outcomes Specifically for Low-Income Students
   1. How are students performing on program assessments?
   2. How are students progressing through the program? For example:
      - Retention rate?
      - Withdrawal rate?
      - Average time to completion?
      - Completion rate (within 100 percent and 150 percent of expected time)?
   3. What are the actual program outcomes for students (e.g., entry into subsequent phase of study, career, etc.)? For example:
      - Employment outcomes, for all programs that have a stated mission focused on employment (include method for how these outcomes are measured).
      - Job placement rates in field of study?
      - Average length of time between completion of program and employment in field of study?
      - Job retention rates?
      - Median starting salaries?
      - Transfer rates to other academic or vocational programs, where applicable.
      - Certifications and licensure exam passage rates, where applicable.
   4. What are the following ratios for the program, where relevant?
      - Published tuition and fees versus earnings.
      - Average net price versus earnings.
      - Median student debt versus earnings.
   5. How does the program rate on measures of student satisfaction? For example, how does the program rate in the following:
      - Comments from students about what made them successful or unsuccessful in the program?
      - A rigorous and transparent methodology for gathering and synthesizing customer satisfaction measures?

addition, a new generation of education technology companies now sell services to institutions that include data analytics, bridge programs that help transition students to the workforce, advising, and 24-7 tutoring.

What was once a vertically integrated institution can increasingly be a disaggregated or unbundled organization, knit together of internal and externally contracted functions. That fact raises interesting challenges for institutional accreditation. First, what exactly is the "institution" in an increasingly unbundled world? How should an accreditation team review those critical functions that are used *by* the institution but not *of* the institution? How much can be unbundled and contracted for and still constitute an institutionally "owned" and delivered program? When in 2013 the Higher Learning Commission removed accreditation from the Tiffin

University–Ivy Bridge partnership,[10] it signaled—rightly or wrongly—that the institution no longer had integrity as a stand-alone entity.

Shifting our focus to programs instead of institutions, which some specialized accreditors such as ABET (formerly known as the Accreditation Board for Engineering and Technology) or the American Academy of Forensic Sciences have done, has substantial benefits (and challenges, too, but we will deal with those in a moment). For example, we know that one's choice of major or program has far more impact on career success and lifelong earnings than does one's choice of institution.[11] Regional accreditation, the backbone of accreditation in the United States, looks at institutions as a whole. It does not much focus on programs *within* the institutions, and that makes sense if the lens is that of full-time, residential students. After all, they experience the institution as a whole, and accreditation sensibly uses a wide aperture in addressing questions of quality. But most college students today are not full time and residential. They are as likely to be parents, working full time, commuting to a campus, or taking courses online. They are not using the fitness center, getting services from the wellness center, or eating in the dining hall. Their experience is at the level of the program, and accreditation that is aligned with their reality—focusing more wholly on program efficacy—makes more sense for those nontraditional students.

For such students, a program-level assessment of quality such as what EQUIP provides is far more valuable than the general institutional assessment of quality that currently happens with regional accreditation. For nontraditional students considering a program that might lead to a better job and the ability to better take care of their families, accreditation that can make clear the claims the program makes, the results it gets, and the workplace demand for the education it provides is far more useful than reassurance about how it governs itself, its planning processes, or its student services. Simply, the kinds of questions that EQUIP foregrounds in accreditation are the ones that matter most to most students. The answers to those questions, shared in a transparent and easy-to-access manner, can help students to be far better consumers of education.

In focusing on program-level accreditation, there is also a subtle and more profound shift from institutional focus to *student* focus, in that the effort essentially tries to answer the question, "What can *you* [the student] expect from this program?" Almost nowhere in traditional undergraduate higher education, explicitly or implicitly, is that question raised. Most traditional undergraduate education is still built around the institution, with little personalized learning. Students still

mostly choose a major and, a handful of electives notwithstanding, they join a learning pathway to a degree that looks pretty much the same for everyone else in that major. The policy conversation focuses on two- and four-year degree programs, and the financial aid for these programs, and thus accreditation reinforces those models.

Yet, as life spans approach one hundred years and the nature of work demands regular retooling and career shifts, why would we think that a 2 percent or 4 percent slice of someone's life, starting somewhere around age 17, would suffice in terms of postsecondary education? It will almost certainly be the case that students with two- or four-year degrees will periodically return for programs that equip them for new opportunities, and these may be, in many instances, shorter programs providing nanodegrees or microcredentials. Some see a future in which students first assemble stackable credentials while working, eventually leading to more traditional degree levels. In that scenario, a student with a strong technology bent coming out of high school could enter a coding boot camp and be in the workforce in less than a year making more than $70,000. They would then have the means to continue their education without debt and at a pace that makes sense for them. If in two or three years they aspire to be a manager, they might return for a management credential. If they are assigned to a multinational team, they might quickly discover that courses in the liberal arts can serve them well.

There are real questions as to how many students can self-curate their learning, but there may very well be a shifting role for the university (or for other new entries into the higher education ecosystem) in which it comes to curate individualized learning pathways for students, providing some or all of what that student needs when they need it, and even perhaps over a lifetime. In this future-looking scenario, the useful unit of measure is the *program*, not necessarily the institution, and accreditation or quality assurance will need to follow suit. EQUIP anticipates that need, and it can be a useful experiment in helping us understand how to perform outcomes-based quality assurance at this more granular level.

The Operational Challenge

Institutional accreditation continues to include the same core elements as it has for decades: an every-ten-year institutional self-study (that now includes a lot more data than before); a site visit by a team of peers; various possible follow-ups, including progress reports and focus visits; and a five-year self-study. My

experience from an institutional perspective, as a member and chair of a visiting team and as a commissioner on the New England Association of Schools and Colleges (NEASC) Commission on Higher Education, is that the process is time consuming for everyone, taken quite seriously, and often shines a light on areas for institutional improvement (and subsequently drives various degrees of actual progress). However, that operational approach to accreditation is ill-suited to program-level quality assurance, where an institution might have hundreds of programs. Institutional accreditors would be ill-equipped, at least as currently structured, to do the work, and it would thus require a new operational approach. How might that look?

Use Experts

If talking about program-level accreditation, the professional associations connected with that program discipline might come to offer accreditation services. For example, for English programs might the National Council for the Teaching of English (NCTE) expand its services, as does the American Chemical Society for programs in chemistry or the Project Management Institute for a program in project management? Professional associations are well positioned to evaluate the claims programs make and to review the assessments they use. The danger here is that it can become self-serving for the field (if peer driven), as I would argue has been the case where critics have accused specialized accreditors in business and physical therapy and nursing, for example.[12]

Use Real-Time Data

The periodic review and visit every few years is ill-suited to the pace of change in most fields, so program-level review invites the use of real-time data as a basis for ongoing monitoring and review. It is not hard to imagine building quality dashboards that link back into program providers' systems and offer ongoing monitoring. Well, given the sorry state of much higher education technology—legacy systems from the 1980s and 1990s in many cases—it *is* hard to imagine today, but a new generation of platforms and systems are emerging and afford an opportunity to base the program review process on real-time, ongoing access to student and program data. Linking into a student information system, a performance dashboard could capture student withdrawals from a program on an as-they-happen basis. Linking into a program's financial aid system, it would be easy to track levels of student borrowing in real time and set flags for acceptable and unacceptable or at-risk levels of borrowing.

Mimic Financial Audits

Because program-level offerings may often be shorter in length than two- and four-year degree programs, if the real-time system access approach just described is not available, then an *annual* audit-like review is more useful than the every five-year approach taken to institutional review, and the use of an independent third-party reviewer carries more weight than what a program provider says about itself. The Flatiron School, a well-respected coding boot camp based in New York, uses an outside audit to review its job placement data and then releases that report to the public and any interested student.[13]

Accreditors could certainly move to adopt these approaches. It is just that it is very hard for a long-established organization of any kind to make such structural innovations. It is harder still if that organization is member driven and historically opposed to this kind of scrutiny (both in type and process) and transparency. EQUIP provides an opportunity to test out new approaches that may use some of what was just outlined or provide other, more innovative ways to assure quality.

Saving Higher Education

There are widespread views that higher education needs rethinking. An outcomes approach to accreditation, such as envisioned in EQUIP, at the program level can go a long way to addressing issues of quality, efficacy, workforce alignment, and consumer protection. Furthermore, because the approach does not prescribe inputs, it allows innovators to try very different approaches to learning and delivery models because it holds them accountable to their claims and their outcomes. The test of quality will be in the ability to deliver proven results, not romantic notions of what an education should look like or require. Indeed, because such an approach will lift the veil that too often obscures actual performance by long-established institutions, it will likely be resisted. Even fiercely so.

That resistance will extend to others differently invested in higher education. I saw some deep reservations regarding EQUIP among some very smart, dedicated Department of Education staffers who fear the kinds of abuses they saw with some for-profit providers. Others hold onto very traditional notions of what education should look like and who attends college today, though they seem blind to the shortcomings of the traditional providers. However, an outcomes-based approach to quality assurance should reassure critics in the way that it brings clarity to the question of quality in a way that current approaches do not, replacing efficacy for quality as a more meaningful lens.

The impact could be profound. Students would know exactly what a program promises to do and then see the data that reports its performance in delivering on those promises. The useful analogy might be to evidence-based medicine, wherein a medical treatment makes clear its intended outcomes and then data establishes its efficacy in delivering the sought-after result. Employers would know what graduates know and can do, restoring confidence in the work higher education does. Innovators would be free to create new delivery models. The Department of Education, which looks to accreditors to assure quality in the programs to which it directs Title IV funds, could be more confident in the schools receiving taxpayer dollars. The kind of transparency offered by an outcomes approach to accreditation would also challenge traditional IHEs to lift their game, as it would become clear which programs at which institutions perform best. Schools and programs that have perhaps coasted on reputation or status markers would be revealed, while lesser-known institutions and programs doing a very good job for their students would have a light shone on them.

One hope is that EQUIP can surface new quality assurance approaches that finally address the reality that students themselves are an input in the calculus of institutional quality. Many of the outcome metrics discussed in accreditation—items such as graduation rates and earnings—fail to recognize the vast differences in student populations. On the face of it, a 95 percent graduation rate seems objectively better, and denotes higher quality, than a 50 percent graduation rate. However, if that 95 percent graduation rate is at an elite university that takes the top 2 percent of high school graduates, while the 50 percent graduation rate is at an open-admissions institution serving poor and academically underprepared students with little social capital or support, one might argue that the latter institution actually adds more genuine value, moves the dial more dramatically for its students than does the elite institution. In other words, context matters in the quality analysis, and new outcomes-based approaches to accreditation would be well served to account for that fact.

That said, outcomes-based approaches to accreditation can become a driver of fundamental change in higher education, because what we measure matters and when those results open or close the flow to more than $120 billion of annual federal financial aid dollars—the lifeblood of higher education—institutions cannot help but respond. The approach embodied in EQUIP is a very modest start, a first stab at what future accreditation could look like and an invitation to QAEs to offer innovative, new approaches to program evaluation. If successful, accreditation can become a significant driver of industry transforming innovation in higher

education and usher in the next golden age for an industry currently struggling at a time when the nation needs it most.

NOTES

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PART III / Perspectives of Policymakers

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Tensions in the Triad

The Evolution of Institutional Quality Assurance Policy

Peter T. Ewell

The higher education policy environment involves the triad of federal, state, and accreditation agency oversight of postsecondary institutions. The roles and changing dynamics among these three actors is the focus of this chapter.

This chapter critically evaluates the "Triad" of oversight for higher education in the United States comprising the federal government, states, and accrediting organizations. The focus is principally, but not exclusively, on the accreditation of institutions. The chapter has three main sections. The first examines the motives, strengths, and limitations of the major players shaping the current environment for quality assurance. The second looks at the evolution of the Triad and is focused particularly on identifying structural contradictions among its players that have revealed themselves in various historical events. The third and final section examines some future perspectives on the likely evolution of the Triad and other quality assurance players over the next decade.

A Review of the Players

The concept of the Triad emerged in the initial attempts to build a comprehensive federal financial aid system first under the Second GI Bill of 1952 and much more extensively under the Higher Education Act (HEA) of 1965. Given that the federal government had made a decision to invest heavily in higher education, providing funds directly to individual citizens to spend on college instead

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of supplying funds directly to institutions, this fostered consumer choice and allowed the federal government to support private as well as public institutions. But it required the federal government to determine if the colleges and universities receiving such support were delivering an educational experience that would benefit the students who attended them. In part H of the HEA, accrediting organizations were called upon to perform this function if they met federally defined conditions. Together with the states and the federal government itself, the result was the Triad, which has governed accountability for colleges and universities in the United States ever since. Each member of the Triad, however, has particular roles, strengths, and challenges associated with playing its part.[1]

The Federal Government

Because individual states fund and govern public higher education, the federal government formally plays an indirect role in quality assurance in the United States. Even so, it is an increasingly important role. Beginning with the HEA of 1965, the federal government has provided substantial support to individual students in the form of grants and guaranteed low-interest loans with which they can pay for college attendance. Given this role, the primary "quality" interests of the federal government are to ensure that the institutions administering financial aid are adequate stewards of these funds and, more importantly, that students are provided with a credential of integrity. A more narrowly focused version of the latter concern is that loan-bearing students earn a credential of sufficient value in the marketplace with which they can pay back their loans. To discharge this interest, the HEA designates accrediting organizations to serve as "gatekeepers" governing access to federal funds. Accordingly, the US Department of Education (ED), advised by the National Advisory Committee on Institutional Quality and Integrity (NACIQI), periodically reviews and recommends recognition of institutional accrediting organizations to ensure that they are acting in the federal interest.[2] Moreover, since 1990, federal interest in quality has focused increasingly on the quality of student outcomes—more particularly graduation rates and evidence of student learning. These performance areas are seen not only as elements of institutional stewardship but also as elements of consumer protection.

A significant feature of federal recognition, apparent as early as the 1972 reauthorization, however, is that it tends to treat all accrediting organizations as though they were accreditors of traditional colleges and universities. Seeing this as a significant drawback, the so-called *Second Newman Report* issued less than a decade after the original passage of the HEA, reacted negatively to the trend

toward lumping "postsecondary" and "higher education" institutions into a single regulatory framework.[3] To some extent, equivalent treatment of this kind is inevitable in any government process. Regulatory provisions, once established, tend to be applied uniformly, and it is difficult to prevent this from happening unless entirely separate sets of criteria are developed for different domains. This phenomenon is also a predictable product of the demand for "equitable" processes applicable to all parties regardless of their real and apparent differences. Together, they make it difficult for the federal government to make nuanced statements about quality that take into account important differences in institutional missions and circumstances.

States

States in the United States have four distinct roles that connect them to questions of quality assurance. First, state governments act as "owner-operators" of public colleges and universities by providing them with direct operating subsidies and by broadly supervising and regulating their operations. For this body of institutions at least, this means that states are as concerned about efficiencies and returns on investment as they are with academic quality per se. And indeed, when state budgets are tight, as they have been for a number of years, this becomes their chief concern. Second, states now play an increasingly important role in collecting information about how and how effectively the higher education system is functioning.[4] State "unit record" enrollment data systems allow state higher education authorities to comprehensively monitor student flows into and through postsecondary institutions within their boundaries to calculate completion rates and the completion of important enrollment milestones.[5] Such systems now contain information on both public and private institutions and can be linked together through multistate consortia to examine interstate patterns of enrollment and success. A significant drawback of state capacity in providing information about institutional performance, however, is that information reported is not consistent across states, a drawback shared by institutional accreditors.[6]

Third, many states provide substantial scholarship support that allows students to attend private as well as public institutions. Acting in this role, a state's primary quality assurance concern is that students obtain a credential of value—one that graduates are satisfied with, that has academic integrity, and that has a payoff in the marketplace of employment. This concern also accords well with the established state role in providing consumer information and consumer protection in other domains of activity such as public health and safety. In recent years,

consumer protection in particular has been a focus for state oversight of for-profit higher education.[7] Fourth, in their role of keepers of the public interest, states are concerned about such matters as economic development, civic participation, and overall quality of life for their citizens. Dimensions of "quality" in higher education that interest them in this regard include institutional contributions to economic development in the form of well-prepared graduates, contributions to knowledge consistent with identified state needs, and institutional responsiveness to the needs of the communities in which they are located (however these are defined). These third and fourth elements of the state role in examining institutional quality, of course, can be manifest in both public and private institutions.

The primary drawback of state regulation in the realm of higher education quality assurance is the fact that its function is so uneven across states.[8] Each state has its own processes, and many states have more than one mechanism for quality oversight and approval applicable to different types of institutions, varying by control (e.g., nonprofit and for-profit) or by the highest level of instruction offered (e.g., associate's degree or below and bachelor's degree or above). As a result, the regulatory authority of state agencies over postsecondary education is quite different in different states. Some require virtually no inspection or evidence for a new institution to be licensed to operate.[9] Once licensed, moreover, there is frequently no ongoing review. Other states, such as New York, operate extensive reviews of private institutions in addition to the considerable oversight over public institutions exercised by its two public university systems. At the same time, most states do not require that a higher education institution be accredited in order to be licensed or authorized by a state, although most encourage them to become so over a period of time. This can lead to a "chicken or egg" dilemma with respect to accreditation: states may require institutions to be accredited in order to be authorized, but accreditation requirements may require state authorization as a precondition for initial recognition.[10] Finally, all states have been severely challenged by lack of resources since 2008, when revenues never really bounced back from the great recession. As a result, they increasingly lack the staffing to undertake an effective quality assurance role, however this may be defined.

Accrediting Organizations

Institutional accreditation in the United States began as a voluntary review process more than a century ago, when individual colleges and universities needed a mechanism to accept one another's degrees and credits. It is currently governed through seven separate and independent regional commissions that

are membership organizations comprising the institutions they accredit, a few national accrediting organizations that chiefly accredit for-profit institutions and programs, and four relatively small faith-based accrediting organizations. Largely outside the purview of what is traditionally included in the Triad, there are also more than 60 specialized or programmatic accrediting organizations that accredit individual academic programs in professional and vocational fields such as health care, engineering, or education; such specialized accreditors sometimes seek federal recognition as gatekeepers to enable individual special-purpose institutions to access federal aid funds without the need to obtain regional or national accreditation.

The typical review process undertaken through accreditation, which changed little until the last decade, involves a periodic comprehensive institutional self-study followed by a multiday visit by an accreditation team comprised of peer reviewers drawn from faculty and administrators in the region. Following the visit, the team prepares a report to the commission, which acts to continue the institution's accreditation and/or to impose sanctions and offer recommendations for improvement. Although this is beginning to change, most accrediting organizations consciously construct their engagement with institutions as consultative, not as an agent of accountability. This is consistent with their constitution as institutional membership organizations. Accreditation's traditional interest in quality has been comprehensive—embracing matters ranging from the adequacy of resources to the appropriateness of institutional governance arrangements to the qualifications of administrative and teaching staffs to the adequate provision of instruction. Since their assumption of the "gatekeeping" role, however, regional accreditors have increasingly been asked to review matters of concern to the federal government, including, most prominently in recent years, the quality of student learning outcomes.

Turning to drawbacks, institutional accreditation has been under fire from a range of commentators almost constantly since the conclusion of the Secretary of Education's Commission on the Future of Higher Education (popularly known as the "Spellings Commission") almost 10 years ago. Probably the most common complaint voiced by critics is that obtaining accreditation is just too easy. Here, some commentators concentrate on portraying institutions that are egregiously deficient in multiple ways (e.g., graduation rates in the single digits or obvious lack of resources) that nevertheless remain accredited.[11] Others cite the fact that so few institutions lose accreditation, in itself, as evidence of lack of rigor.[12] Many of the same critics believe that one reason for lack of rigor is that accreditation

is owned and operated by the entities that it is supposed to judge—a situation that creates an inherent conflict of interest. A third criticism, mostly voiced by elite institutions, is that accreditation imposes unnecessary costs and burdens on institutions. And a final claimed drawback is that accreditation does not provide much consumer information to the public with respect to college choice or consumer protection.[13]

In addition to the recognized members of the Triad, several other players have emerged in recent years to complicate the national picture with respect to higher education quality assurance.

Third-Party Organizations and the Market

US higher education is distinctive because of the high proportion of institutional operating costs paid by students.[14] This condition renders US institutions unusually sensitive to market forces as they compete for students. At the high end of the institutional selectivity range, this natural competition is intensified by the quest for the most qualified students to enhance the institution's reputation. Not surprisingly, this has meant the emergence of a vast amount of "market information" issued by institutions themselves and by the media. Perhaps the most notorious among the latter are the rankings of "America's Best Colleges" issued each fall since 1983 by *US News and World Report*, which pioneered the notion of college and university "league tables" that has now emerged all over the world. A similar, though less powerful and more indirect, influence is exerted by institutional surveys such as the National Survey of Student Engagement (NSSE); although these surveys do not directly publish results for individual institutions, sufficient information is usually obtainable to compare performance. A parallel set of comparative reports, such as those published by the *Wall Street Journal*, examine the earnings of former students from various colleges in numerous fields. Finally, a new breed of philanthropic organizations such as the Lumina Foundation and the Bill and Melinda Gates Foundation are actively advocating for a particular view of quality, with rewards accorded to institutions that are recognized by their criteria as "effective." A prominent example is the Aspen Institute's annual prize for community college excellence.

Operating alongside the formal Triad of state, federal, and accreditation oversight, these organizations act as a kind of "fourth estate" of quality review that can occasionally exercise considerable influence. Meanwhile, the market itself exerts its own quality discipline by enacting a wide range of student consumer preferences about the kinds of postsecondary education individual students want

to purchase. This view of quality is largely about "fitness for purpose" and, in contrast to institutional prestige, which governs the high end of selectivity, is generally about price, convenience, and to some extent the perceived advantage of a particular credential in the employment market. Singularly lacking in this picture, however, is the quality of instruction or of ultimate student learning.[15]

Students and Employers

Although they are sometimes prominent in the quality assurance arrangements of other national jurisdictions, students have had a relatively minor role to play in this arena in the United States. For the most part, students are included in the process as informants—the object of surveys used by institutions to make their case for effectiveness and interviewed during an accreditation site visit—they are not typically involved in evidence gathering or decision-making for accreditation. There are signs that this is changing, though. For example, the Western Association of Schools and Senior College and University Commission (WASC-SCUC) included two students on the steering committee who were responsible for drafting its latest *Handbook of Accreditation*. This has stimulated further calls for involving students as members of site visit teams and of accrediting commissions. A recent example is the recognition process now being developed by a new organization, the Quality Assurance Commons for Higher and Postsecondary Education.

There has, of course, been some skepticism about an increased role of students because students are perceived to be inexperienced in this role and cannot be expected to contribute regularly because of their limited time available. There is also the substantial issue of how the students to be included should be identified or selected such that they are truly representative of student opinion. At the same time, the role of students in quality assurance mechanisms at the institutional level has been a topic of increasing interest for accreditors when they review institutions. Consequently, peer reviewers are asked to determine the extent to which students are meaningfully included in such processes as course review and approval, program review, and faculty evaluation.

These same points can also be broadly advanced for employer involvement in institutional quality assurance processes: reviews like accreditation will more often solicit opinions from employers as part of the evidence base on which to make a determination of quality than they will include employers as part of the determination itself. This is not true for much of programmatic accreditation, which in many cases is actively governed by professional associations comprised of employers. In

parallel, employer input is typically more visible in reviewing institutions with a prominent vocational mission. That said, there is growing evidence that employers want to play a greater role in reviewing institutional quality. For example, the US Chamber of Commerce is exploring an initiative that would involve groups of employers in independently certifying the quality of graduates of individual postsecondary institutions and publishing the results.[16] Experience gained in including employer input to date, however, both in these efforts and in similar efforts abroad, suggests that it is challenging to systematically involve employers because many businesspeople are not willing to devote the time needed to do this well.

Offshore Quality Assurance Organizations

Finally, given significant increases in institutions that offer educational programs beyond the boundaries of the United States, there is a growing role for offshore quality assurance organizations. Distance delivery is accelerating this phenomenon, and it is likely that the next couple decades will be characterized by a "flatter" higher education world. Increased globalization has several dimensions that affect quality assurance. First, it means that academic standards for undergraduate and master's-level work are converging across national contexts. The Bologna Process in Europe is the most visible manifestation of the emergence of aligned global standards, with counterparts in Australasia as well as Central and South America. To be acceptable abroad, US standards for student learning outcomes will need to be aligned with these new prototypes and be assessed in similar fashions. Another dimension of going global is that the quality of US institutions operating abroad must be assured. At the same time, in order to gain credibility, non-US institutions are beginning to seek and receive recognition from American accreditors. Both of these should entail extending partnerships between American accreditors and other national quality assurance agencies, which need to know what US accreditation entails and what they can expect when dealing with it. Finally, a "flattening" world demands that US college graduates have global competencies, including an understanding of other cultures, geographic knowledge, and foreign language skills. One implication of these trends is that these should be added to established lists of generic competencies that accreditors require institutions to teach and assess.

Structural Contradictions within the Triad

When it was originally established, the Triad was conceived as a set of roughly equal partners with relatively well-defined and distinct areas of responsibility.

This original conception was never fully realized at the outset, and both these characteristics have eroded steadily and substantially as the Triad evolved over the ensuing five decades. At the same time, although this was not as clearly spelled out in the language of the Higher Education Opportunity Act (HEOA) and its accompanying regulations, members of the Triad were intended to actively communicate and collaborate—sharing information gathered from institutions and regulatory agencies and reinforcing one another's actions to ensure quality. But because few concrete mechanisms were put in place to promote communication and collaboration, it largely failed to happen. As the Triad evolved, moreover, a number of structural contradictions have affected its operation.

The Fiction of Equal Partnership

Accrediting organizations played many important roles in US higher education before they became members of the Triad. They stimulated institutional quality improvement efforts, they convened colleges and universities around topics of academic interest, and they communicated best practices in instruction and institutional administration through a peer-based accreditation review process. In discharging these functions, accreditors remained independent players, largely unaffected by the behaviors of the federal government and the states. With accreditors' collective assumption of the gatekeeping role under the Triad, this presumed equivalence among key actors in the Triad changed fundamentally. Accreditors were effectively "deputized" by the Department of Education to fulfill a federal function under stipulated structures of recognition and authority. The department "recognizes" accreditors, not the other way around: the act of recognition itself implies unequal status because the agenda remains a federal agenda.

Lack of equivalency also affects the third member of the Triad, the states, but for a different set of reasons. Unlike accreditors, states are constitutional bodies with sovereign authority. At least as important, the Constitution gives them, not the federal government, responsibility for education. As a result, the federal government is not legally empowered to "recognize" states to fulfill federal functions, thereby conferring on them a subordinate status. Instead, inequality is the result of a particular behavioral history of the relationships among them, beginning with the civil rights movement of the early 1960s and fought out in the federal courts. The victory of the federal government in these contests that resulted in desegregated schools and equivalent voting rights over the objections of several states was a precedent that could, in principle, apply to the oversight of quality in higher education. It was not until the 1992 reauthorization of the HEA that this

potential was visibly realized in the form of federal creation of the State Postsecondary Review Entities (SPREs). In principle, the SPREs represented the closest approach yet to representing the states as equal partners in the Triad. Part H of the reauthorized 1992 HEA made it clear that SPREs were expected to set their own standards for reviewing institutions "triggered" for review by high default rates and that they should conduct their reviews as independent entities. As the process unfolded in practice, however, it became clear that both the standards and review processes established by SPREs were subject to appraisal and direct approval by ED, and several state drafts were turned back for revision against state protests. The issue became moot in 1994 when the SPREs were abolished by congressional action, but the precedent of the states as subordinate actors to the federal government was firmly established.

The Fiction of Unitary Players

Among the three members of the Triad, only the federal government is a single actor. Both recognized accreditors and the states comprise multiple players, each of which has distinctive motives and characteristics. All accrediting organizations are recognized by ED according to the same set of criteria, but in virtually every other respect they are different from one another. With respect to type, seven are regional commissions that accredit degree-granting institutions within known jurisdictions, three are national accreditors that approve mostly for-profit institutions and programs (one of these was recommended by NACIQI to be dropped from federal recognition in 2016), and four are faith-based accreditors that approve degree-granting institutions dedicated to preparing graduates for ministerial or rabbinical service. Within each type, moreover, each accrediting organization has its own standards against which to review institutional/program condition and performance, its own schedules for review, and its own review processes. Although these resemble one another, there is as yet no standard set of practices, or even a common terminology, that all embrace.

The 50 states are equally diverse with respect to their capacity to and interest in examining institutional and program quality. While all license institutions to operate within their boundaries, the level of review associated with such recognition varies from virtually nothing more than a written application and a licensing fee to comprehensive scrutiny including site visits. And the agencies responsible for this function can be equally diverse within states, with different organizations responsible for different institutions frequently depending on control or degree level.

The "Principal-Agent" Problem

As noted previously, an unequal power relationship between the federal government and institutional accrediting organizations is inherent in the recognition process: the former expects the latter to conduct business on its behalf in certifying institutional quality.[17] Such a relationship is a classic example of what scholars of public administration call "the principal-agent problem."[18] Because the "agent" (the accreditor) to whom oversight authority is granted is a different entity from the "principal" (the federal government), it may not establish standards or act on them in the ways the "principal" would have done. Some of this may be due to communications failures and some to the inevitable blurriness that occurs in all situations characterized by overlapping responsibilities. A potentially more serious dimension of the problem is that the "agent" is an independent organization that may have its own agenda. As a result, government's intentions may be subtly "captured" in practice. The result is a dynamic of greater and greater prescription of the "agent's" activities and scope of authority by the "principal" in order to ensure that government's wishes are in fact carried out.

The federal role in accreditation is a classic instance of the principal-agent problem. Accreditors are independent membership organizations that, by definition, are beholden to their constituents. In the case of institutional accrediting organizations, these are individual colleges, universities, and schools. In many cases, the interests of these actors are quite different from those of the federal government. As a result, the standards established and the evaluations undertaken by accrediting organizations are frequently caught between the minimalist accountability preferences of institutions and the federal objective of establishing a rigorous eligibility review process. In response, federal recognition criteria have tended to become ever more specific in order to correct this "agency drift," a dynamic played out increasingly visibly in recent years in NACIQI recognition discussions.

The Result: An Increasingly Uneasy Relationship

Perhaps the best way to describe the relationship between the federal government and accrediting organizations is dynamic codependence. On the one hand, the federal government gets a quality assurance process through accreditation very cheaply. While it is frequently unhappy with the rigor and consistency of accreditation's efforts, it would otherwise have to create such a capacity itself at considerable cost. On the other hand, recognized accrediting organizations

get an almost-guaranteed membership base because few institutions can afford to remain unaccredited. Certainly, they are suspicious of excessive government control and their status as membership organizations means that they cannot push too hard in pursuit of the federal agenda. But they can accept the resulting bargain as long as it allows them to continue to fulfill their original purposes of institutional self-examination and improvement. Neither can afford to operate without the other.

The terms of the "principal-agent" problem, though, mean that the relationship is always dynamic. During periods of laissez-faire with respect to government interest in higher education, accreditation is left to do its business as it sees fit. This was arguably the case during accreditation's "golden age" in the 1950s and, to a lesser extent, during the mid-1990s. When higher education is seen as more important to the national interest, government attempts to exert greater control through additional or more specific regulation. This was apparent in 2005–2007 when the Spellings Commission strongly criticized accreditation for not paying more attention to student learning outcomes and for being a barrier to innovation,[19] and when ED followed this up with aggressive moves to create new regulations. To be sure, the initiative under both proactive and laissez-faire conditions decisively rests with government. But the price government pays for being in the driver's seat is that the amount of quality assurance leverage that it can exert over colleges and universities indirectly through accreditation is smaller than if it were able or willing to act on its own.

These structural contradictions have produced a varied history of relationships among the three members of the Triad over the half century of its existence, but the steady trend has been toward the dominance of the federal government, embodied by ED, in terms of power and influence. At the same time that federal interests predominate, many of the original distinctions in function embodied in the individual members of the Triad have eroded, so there is considerable process overlap and duplication. These trends will likely continue such that the next decade may well witness considerable change in roles and responsibilities.

Looking Forward

Now probably represents the most inauspicious point in time for anyone to be making a confident prediction about the future of the Triad. First, public criticism of accreditation has been at an all-time high, with critical newspaper stories appearing in high-visibility news outlets like the *Wall Street Journal* and the *New York Times*. In reaction, bills have already surfaced, and resurfaced in Congress, supple-

mented by policy proposals by Washington think tanks, which would significantly alter the structure of quality assurance for higher education. The country has been through a bitter presidential election, with little hope of a reauthorization of the HEA in the cards until the political dust has settled. Unprecedented actions have also taken place in the realm of quality assurance in just the past couple years, including a proposed first-time-ever withdrawal of recognition for a major institutional accreditor (ACICS, or the Accrediting Council for Independent Colleges and Schools) and a new federal process of quality assurance being put in place (EQUIP, or Educational Quality through Innovative Partnerships) to recognize nontraditional providers using quality assurance entities that are not recognized accreditors. As a result, it is probably safe to say that no decade since the one following 1965 is more likely to see changes in the structure of the Triad, including whether it will continue in its current form.

Despite this uncertainty, there are probably some things that can be anticipated. The first is that the federal government will continue to use accreditation as a gatekeeper for access to federal funds because there is no ready alternative. While several reform proposals have been advanced that increase the role of the federal government in quality assurance, none of them rely entirely on ED to carry the burden of review.[20] The reason is that such proposals, if enacted, would be unaffordable. And a significant advantage of the current system of third-party accreditation is that it operates with little taxpayer money. This is an extremely positive feature in an era of scarce public resources, and Congress is unlikely to change it regardless of the party in control.

That said, there has been no lack of proposals to change accreditation and with it, the structure and function of the Triad from the policy community over the past couple years. These include reports from the American Council for Education (ACE),[21] NACIQI,[22] the Center for American Progress (CAP),[23] the Council for Higher Education Accreditation,[24] and the National Center for Higher Education Management Systems (NCHEMS).[25] Other sources include legislation introduced by Senators Warren, Durbin, and Schatz, and by Senators Bennet and Rubio, as well as proposed rulemaking by ED.[26] The sections that follow review some of the most important of these, ranging from the most radical and difficult to accomplish to the most straightforward.

Governance

The current arrangements of the Triad are premised on coordination and an assumption of equal partnership among its three members. But there is no

mechanism to ensure that this takes place. Partly as a result, the federal government increasingly tends to drive the relationship. One proposal is to create a new freestanding federally chartered (but not federally owned) body to oversee and coordinate institutional accreditors.[27] The form of such an organization could be something like the Federal Reserve Board, the Federal Communications Commission, or the Securities and Exchange Commission—funded, all or in part, by federal sources but with an independent charge and board of directors. Creating such an authoritative freestanding nonprofit body to coordinate and oversee regional accreditation was one of the recommendations of the National Policy Board on Institutional Accreditation (NPB) in the wake of the 1992 amendments to the HEA.[28] Alternatively, NACIQI has proposed that it assume this responsibility directly; this would require an expanded scope of authority, increased resources, and a staff.[29] Whichever alternative is adopted, or one not yet proposed, the loosely coupled governance arrangements under which the Triad now operates are impeding its effectiveness as an entity.

A "Risk-Sensitive" Approach

In the name of "equity," the current accreditation process treats all institutions the same. This means that sound institutions with good track records that would undoubtedly be reaffirmed are subject to what is in their view "unnecessary" scrutiny, while institutions that have substantial deficiencies apparent to both accreditors and the public are not given sufficient attention. The alternative is for accreditors to adopt what has been termed a *risk-sensitive* approach to review. Under this approach, accreditors would determine the level of scrutiny applied in institutional reviews on the basis of the past track record of the institution to be reviewed with respect to quality issues. Factors that might be considered here include previous problem-free interactions with accreditors (and other quality assurance players such as states and ED), a history of financial stability, minimal levels of student complaints, and continuing high-quality outcomes such as learning gains and graduate success. A parallel provision would be to establish multiple tiers of recognition (e.g., basic accreditation and "accreditation with distinction") depending on the institution's performance. This approach has been endorsed by ACE, NACIQI, NCHEMS, and CAP, and is a central feature of the legislation proposed by Warren, Durbin, and Schatz.

Accreditors, of course, are free to propose and undertake such a reform without reference to the terms of the Triad. Some claim, moreover, that they already operate in this manner as institutions found to be problematic in various areas

frequently must submit additional compliance reports or endure additional site visits or reviews. But there is as yet no decisive or widespread move in this direction by accreditors. Under these circumstances, government actors like ED may have an incentive to include such recommendations in their reviews of individual accreditors, and Congress and the new administration may act to incorporate provisions consistent with them into the HEOA when they eventually get around to reauthorizing it.

Focus Quality Assurance on Student Learning

Accreditation is particularly challenged because it purports to be about everything an institution does. But teaching and learning at the undergraduate level is a core function for every college and university—arguably, *the* core function. It is the only significant activity shared by every institution of higher education, from community colleges to research universities. As such, it should be the central object of scrutiny by those, such as accreditors, who seek to assure quality. What would doing this entail? One change might be that those entities examining institutions would undertake more-intensive reviews of the effectiveness of an institution's teaching and learning approaches, especially at the undergraduate level. Another characteristic would be a much clearer focus on audits and similar evaluation techniques that "drill down" into the actual academic experiences of typical students. This approach has been endorsed by ACE, CAP, and NCHEMS, and is a central feature of the legislation proposed by Warren, Durbin, and Schatz.

Like the aforementioned risk approach, accrediting organizations already have the authority to undertake such actions on their own. But absent sufficient incentives, most have up to now not moved decisively in this direction. As discussed previously, either ED or Congress and the administration could act through direct regulation or the reauthorization process to induce accreditors to draw more attention to how accreditors require evidence of student learning and how rigorously they examine it.

Public Reporting

Until recently, accreditors did not provide much information on the results of institutional reviews other than whether the institution under review maintained its accredited status. But much of this has changed in recent years because many institutional accreditors are making the results of reviews more publicly accessible. At the same time, the federal government and, to a lesser extent, the states already make the results of what they find out about institutions publicly

available. These developments reinforce the conclusion that this matter is already being attended to by all members of the Triad.

In conclusion, the formal Triad—supplemented by additional quality assurance actors that have come on the scene since 1965—may undergo a process of significant reinvention in the coming five years. This is largely because the balance among its various players has shifted a good deal since the HEA was enacted, and many of the tensions engendered by these changes are becoming increasingly hard to resolve. But it is probably safe to say that all three of the Triad's actors will remain in place with functions roughly similar to the ones they now have. And the dominance of the federal government will continue and may increase.

Accreditation, as the weakest link of the Triad and the one that has been the object of the most public criticism, will likely undergo changes in structure and process either through voluntary action in response to circumstances or under direction from the federal government. State roles will probably continue to be dispersed and uneven, but there is a greater likelihood of collective action and coordination than any time in the past. Initiatives such as the State Authorization Reciprocity Agreement (SARA), developed to allow states to engage in mutual recognition of one another's institutions to allow less-restricted access to distance education offerings across jurisdictions, have proven quite popular, and there is some potential to extend similar provisions to other dimensions of state regulation. Meanwhile, a solidly Republican administration and Congress will likely favor states' rights in every sector. At least as important, however, is the need to promote better lines of communication among the three members of the Triad, as well as among the constituent entities within accreditors (individual accrediting organizations) and among the individual states.[30] Establishing such improved lines of communication should be a primary goal of reauthorization.

In parallel, student interest in higher education quality is potentially at an all-time high because of high tuition and debt levels, with consequent concerns about future return on investment. While there have been few systematic organized efforts to coalesce growing student concerns with the prominence of those in Europe, where formal representation of students at higher education policy tables is more common, such a voice probably has a better chance of emerging in the decade to come than at any time in the prior history of the Triad. The potential for employer engagement is similar. Negative employer views of the knowledge and skills of recent college graduates have grown slowly but steadily; with the exception of the US Chamber of Commerce initiative al-

ready mentioned,[31] though, there have been few specific proposals for a greater role for the sector. Both interest groups could also benefit from changes in the HEOA designed to increase the proportion of public members on accreditation commissions, which has been widely proposed.

In short, there is more likelihood of changes in the Triad in the near future than in any time since it was first established. The extent to which such changes will have an impact on the actual quality of the nation's colleges and universities, however, remains unclear.

NOTES

1. Some of the material in the three sections following was previously published in an earlier form in Peter T. Ewell, *US Accreditation and the Future of Quality Assurance* (Washington, DC: Council for Higher Education Accreditation, 2008), chapter 4, sections 1–3, 84–102. Used with permission.

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17. Some material in this section was previously published in Ewell, *US Accreditation and the Future of Quality Assurance*, chapter 4, section 1, 89–90. Used with permission.

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Managing Risk to Students and Taxpayers in Federal Financial Aid

David A. Bergeron

Much of our higher education policy is driven by the federal government's student financial aid commitments to support college attendance. Risk management strategies are needed to protect those funds. This chapter reframes the role of accreditation to focus on quality assurance as risk management.

> Here the seeds were planted from which grew my firm conviction that for the individual, education is the path to achievement and fulfillment; for the Nation, it is a path to a society that is not only free but civilized; and for the world, it is the path to peace—for it is education that places reason over force.
>
> —Lyndon B. Johnson, 1965

The Higher Education Act (HEA) of 1965 (Public Law 89-329)[1] swung open a door to education beyond high school for the young people of America by striving to remove the economic and educational barriers that limited access and success. Since the enactment of the HEA more than 50 years ago, tens of millions of our nation's citizens of all ages have passed through those new doors.

Opening the doors to postsecondary education to more Americans, however, has not been without risk. While some have been successful in obtaining one or more degrees or certifications, others have faltered, leaving school before achieving their goal. Nonetheless, the country has benefited from the gains in productivity and economic growth fueled by the increased levels of educational attainment.

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The gains have come with substantial federal investment. In recent years, the federal government has provided more than $120 billion annually in grants, student loans, and tax benefits to help millions of students and their families meet educational expenses for postsecondary programs provided by public and private nonprofit institutions of higher education and for-profit educational institutions.[2] Without the financial assistance provided by the federal government, many students from low- and moderate-income families would not be able to afford college, thus denying them access to postsecondary education and the accompanying economic and social benefits.

If the HEA were enacted today, the US Department of Education (ED) would need to pay particular attention to the outcomes of the federal student aid system. Likely, Congress would also be more explicit about the goals of the federal student aid system. Focusing on outcomes—rather than inputs and processes—is at the core of the Government Performance and Results Act.[3] This act requires all federal agencies to assess program performance against the goals established for the program, and it is likely that ED would be looking to accreditors to help facilitate strong student outcomes and ensure that the institutions were effective in meeting established goals.

Government as "Risk Manager"

As focused as the federal government is and should be on program outcomes, and as the steward of public funds, it also must play the critical role of risk manager. The federal student aid programs embody elements to manage risk.[4] Few elements of the student aid program, however, are viewed explicitly as risk management strategies. Risk management literature suggests that there are four ways to manage risk as summarized succinctly in table 9.1.

The federal student aid programs have adopted prevention strategies designed to reduce risk for students, families, and the taxpayer by stipulating robust institutional, program, and student eligibility requirements. For instance, students receiving federal Pell Grants or direct student loans must demonstrate both "an ability to benefit" (e.g., having obtained a high school diploma or GED) and a financial need. Further, the federal government relies on accreditation to manage risk by assuring the quality of postsecondary education programs supported with taxpayer funds.

The federal student aid programs also include loss control strategies. For example, the student loan programs include provisions for terminating the eligibility of institutions to participate in the federal aid program when the default rate of their

Table 9.1. Examples of Risk Mitigation Strategies Employed by Federal and State Governments with Student Financial Aid

Strategy	Description	Example
Prevention	Attempts to reduce frequency and severity of bad things happening	Institutional, program, and student eligibility requirements
Risk Shifting	Transfers the responsibility and accountability for the bad outcomes to another party	Use of student loans to finance higher education to transfer risk from the federal and state governments and institutions to students
Risk Spreading	Distributes costs of bad outcomes to a larger group or pool of individuals	Tuition-free public higher education options or fully funding through grants
Loss Control	Manages or mitigates the consequences after bad outcomes occur	Risk sharing by lenders and guaranty agencies in the bank-based Federal Family Education Loan program[1]

1. This loss mitigation strategy was largely ineffective because the lenders and guaranty agencies never really had skin in the game. Instead, they largely used other federal revenues to pay their share of the risk sharing.

students is too high. Another loss control strategy was contained in regulations that sought to restrict the ability of aid to be used in nondegree programs at public and nonprofit institutions and in most programs offered at for-profit institutions if these programs do not lead to gainful employment in a recognized occupation for graduates. Loss control strategies to this point, however, are fairly limited and affect relatively few programs and institutions.

Policies and statutory changes to the federal student aid programs, particularly the federal student loan programs, have increasingly moved the financial risk from taxpayers to students. This risk-shifting approach is in sharp contrast to an alternative model of risk sharing that would provide tax-funded access to a free public postsecondary education.

Not surprisingly, the number and types of risk mitigation strategies have changed as the federal investment in student financial aid has increased. The emphasis of the current strategies has been on protecting the interest of taxpayers, leading to greater risk for individual students who must now take more personal financial responsibility for their education.

Since the 1980s, federal aid has increasingly relied on loans rather than grants to cover student educational costs. Consequently, students have come to be viewed more as borrowers, and their repayments have become a source of revenue for

loan providers. At first, those revenues flowed to private lenders to encourage them to continue to provide the capital necessary to make student loans. Ultimately, however, those revenues began to flow to the federal government through federal direct student loans when the lenders were unable to raise needed capital during the credit crisis of the late 2000s.

Changing Ways the Federal Government Has Financed Postsecondary Education

Prior to and since the enactment of the HEA, grants, loans, and, most recently under the tax code, tax benefits have played different roles in helping students and their families finance a postsecondary education, and yet the role of accreditation in establishing institutional eligibility has remained consistent. It is no wonder, then, that the results of accreditation as a risk management strategy have been disappointing. The differing ways that the federal government has financed postsecondary education should influence policies surrounding quality assurance and protecting students from the risks associated with the choices they make when pursuing a postsecondary education.

The Primacy of Federal Grants: 1949–1980

Until 1980, grants were the predominant form of federal aid, with federal Pell Grants being the largest of the grant programs (fig. 9.1). Throughout the early days of direct aid to students, there were a number of federal grant programs, including the Federal Supplemental Educational Opportunity Grants (FSEOGs), the State Student Incentive Grants (SSIGs), and the GI Bill. Even in 2012–2013, Pell Grants accounted for two-thirds of the federal grant aid provided to students enrolled in postsecondary education institutions.

Federal grants do not need to be repaid; therefore, the taxpayer, to a significant extent, holds the risk associated with providing grant aid. If the student graduates and finds gainful employment, there is a return on investment to the student, and the taxpayer gains by increasing the tax base. If the student does not graduate or find gainful employment, the financial return on the federal investment is limited. During this period, accreditation was a critical element of the government's risk management strategies as accreditation served to exclude poor-quality providers from the federally supported aspect of the higher education system.

To mitigate the risk to the taxpayer, the federal government imposed eligibility requirements on students, programs, and institutions that receive the grants. For example, an undergraduate student must have a high school diploma, general

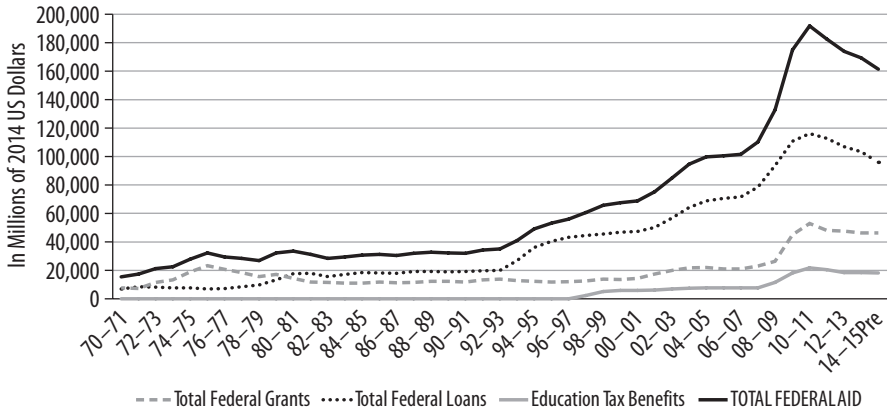

Figure 9.1. Federal Grants, Loans, Work-Study, and Tax Benefits, 1970–1971 to 2014–2015 (in millions of 2014 $). Source: "Trends in Student Aid 2015," *College Board*.

education diploma, or a demonstrated and documented ability to benefit to receive a grant under Title IV of the HEA, and limits are placed on the number of years a student can receive a Pell Grant. An eligible program must also lead to a degree or certificate, and if the program leads to a certificate (or is offered by a for-profit postsecondary institution), it must lead to gainful employment in a recognized occupation.

Moreover, and significantly, only eligible institutions can offer eligible programs. To be eligible, institutions must be legally authorized by a state, certified as administratively capable and financially responsible by ED, and accredited by a recognized accrediting agency. For this reason, accreditation is critical to managing the risk of the federal government through its gatekeeping role in identifying eligible institutions.

In 2011–2012, 44 percent of undergraduates received federal grant aid, with 41 percent receiving a Pell Grant.[5] Other federal grants that undergraduates receive include GI Bill benefits awarded to returning veterans, FSEOGs awarded by institutions, and SSIGs, and, more recently, Leveraging Educational Assistance Partnerships (LEAPs), which are awarded by states.

To receive funds under SSIG or LEAP, a state was required to provide a share of the funding of the grants made to students. This, too, was a risk mitigation strategy that made each state responsible for a share of the financial aid awarded to low-income students in the form of a grant. However, this strategy was not fully effective, as states could cut appropriations or operating grants to institutions of

higher education without running afoul of the cost-sharing requirement. This effectively permitted public institutions to raise tuition and fees to compensate for the reduction in state spending for higher education. While disinvestment by states has been a trend over the past several decades, it accelerated significantly in all but two states during the recession of 2008–2009.[6]

Data about federal granting programs has shown that different types of students are more (or less) likely to receive federal grants, including Pell Grants. Students from families with incomes below 150 percent of the poverty line are more likely to receive Pell Grants (71 percent) when compared to those above 150 percent of the poverty line (45 percent for those between 151 to 300 percent and 4 percent for those above 300 percent).[7] Because of the significant relationship between income and race/ethnicity, students from certain minority backgrounds—African Americans, Native Americans, and Hispanic Americans—are more likely to receive federal grants, including Pell Grants, when compared to white, non-Hispanic students and Asian students.

While it is clear that grant programs like Pell have been effective at increasing access to postsecondary education, it is less clear whether grants have been effective in increasing degree attainment or certificate completion or offering strong labor market outcomes for those who do complete a program of postsecondary education.

With grants—and, at the state level, subsidized tuition—taxpayers had borne much of the risk of failure in our higher education system, and accreditation has served to mitigate the risk to taxpayers through prevention as a risk management strategy. That has changed significantly as higher education became increasingly financed by students and their families with the support of student loans. With the transition toward loans, the risk of institutions failing to adequately meet their needs shifted to students, and the importance of accreditor as a mitigator of that student risk increased.

The Primacy of Student Loans: 1980–Present

Since 1980, student loans have been the primary source of federal aid, and this use has accelerated after 1990. Lending is about transferring risk. In the case of student loans, the risk has been increasingly transferred from the lenders and taxpayers to the students and parents. This is particularly true because student loans are difficult—if not impossible—to discharge in bankruptcy. Because the risk is now held primarily by individual students,[8] this makes other risk mitigation strategies, including those connected to accreditation, less important to institutions and

the government but even more critical to students. This is problematic because students have such limited knowledge of and no control over this vital system, yet they are taking an outsized proportion of the risk.

Data about the use of federal student loans shows that in 2012–2013, 58 percent of undergraduate students completing a degree program took out a federal student loan and 63 percent of graduate students completing a degree that year graduated with federal student loan debt. The median debt[9] for graduating undergraduates was $5,500 with one-quarter of those having a total debt for their education of $20,000 and 10 percent with a total debt of $31,770 or more. Among those enrolled at the graduate level, 63 percent took on debt, with a median debt of $30,697, while one-quarter of those completing a graduate degree with debt had combined undergraduate and graduate federal student debt of $72,365, and 10 percent with federal student loan debt of $120,875.[10]

Students who earned degrees from private for-profit and private nonprofit institutions as undergraduates were more likely to borrow than those attending public institutions of higher education (86 percent and 72 percent vs. 50 percent). A similar pattern holds for graduate students completing a degree program with borrowing at 80 percent of those attending private for-profit institutions compared to 65 percent at private nonprofit institutions and 59 percent attending public institutions.[11]

Students from families with incomes between 150 percent and 300 percent of poverty are more likely to borrow to pay for their undergraduate degree program (71 percent) when compared to those below 150 percent of poverty (68 percent), and those above 300 percent (54 percent). At the graduate level, those completing a degree program from the lowest income category are most likely to borrow (64 percent) when compared to those with incomes between 150 percent and 300 percent of poverty (58 percent) or above 300 percent of poverty (51 percent).[12]

Because of the relationship between income and race/ethnicity, students from certain minority backgrounds—African Americans, Native Americans, and Hispanic Americans—are more likely to borrow when compared to white, non-Hispanic students and Asian students.

Unlike grants—and the low-tuition policies that were common until student loan debt became acceptable and commonplace—it has not been demonstrated that student loans improve access. Further, student loan debt has not been shown to have improved retention[13] or degree completion and seems to be related to graduates being willing to accept lower-paying jobs.[14]

Under the federal student loan programs, most risk is shifted or transferred from the federal government to the student or, in the case of Parent PLUS loans, to the parent of the undergraduate student. The federal government does take steps to prevent borrowers from taking on inappropriate risk by establishing loan limits and, for the most part, applying the same eligibility requirements as it does for grants. It has also established metrics that can prevent institutions with unacceptable student default rates from participating in federal aid programs. And with the advent of income-based repayment options for federal student loans in 2009 and the associated ability to repay student loans through service under the Public Service Loan Forgiveness program, the federal government has assumed a greater share of the risk associated with the loans. The primary risk, however, remains with the student or parent that borrows. Because of this, accreditation is even more necessary to make sure students can be confident they are getting what they paid for.

Risk Mitigation in the Student Aid Programs through Accreditation

The federal government's primary risk prevention strategy is directly connected to institutional eligibility that involves:

1. states authorizing an educational institution;
2. independent nonprofit, nongovernmental organizations accrediting postsecondary institutions; and
3. ED certifying to the administrative and financial responsibility of each institution that participates in the financial aid programs.

Since students and families have limited ability to independently validate the quality of education being delivered by institutions, they must rely on these processes to ensure a basic level of quality. This basic framework for establishing eligibility to participate in the aid programs, referred to as "the Triad," has been in place since the 1960s. Today, however, many have doubts about the value of each element of the Triad, with the greatest scrutiny falling on accreditation.

Each party in the Triad has a different role, although there is some overlap. For example, the federal government and accreditors both examine the financial health of institutions, and there is nothing to prohibit states from looking at this issue as well. Arguably, accreditation plays the most significant role by establishing a minimum level of quality of education provided by institutions participating in the federal student aid system.

The decision to rely on accreditation is rooted in the federal government's limited role in education. The Tenth Amendment to the US Constitution enshrines the concept of federalism by reserving powers not delegated to the national government to the states or the people. The constitutional limitation was specified in the National Defense Education Act (Public Law 85-864), General Education Provisions Act of 1968 (Public Law 90-247), and, ultimately, in the Department of Education Organization Act (Public Law 96-88). In these pieces of legislation, Congress made clear that it did not intend to increase the authority of the federal government over education or diminish the responsibility for education, reflecting a faithful reading of the Tenth Amendment, which reserved education to the states.

From the 1860s, the federal government provided support to states (under the First and Second Morrill and Bankhead-Jones Acts) to support the development of public higher education institutions focusing on mechanical arts and agriculture. However, the federal government assumed that the states would invest in the development of quality programs and institutions. Imposing the limitation on education officials exercising direction, supervision, or control over critical elements of quality—curriculum, program of instruction, and personal—posed a challenge when Congress began expanding support for postsecondary education toward students with the Servicemen's Readjustment Act of 1944 (commonly known as the GI Bill) and, later, with the National Defense Education Act of 1958.

Congress initially allowed states to oversee the institutions where returning veterans could use the newly created benefits. Within a few years, thousands of fly-by-night schools were created to take advantage of the new federal money flowing into education. To ensure quality and prevent these fraudulent institutions from continuing to operate, Congress turned in 1952 to the accreditation agencies that already existed. Congress would continue to rely on accreditation as financial aid programs were expanded first to students in science, engineering, math, and foreign language and area studies programs, then to students from low- and moderate-income families, and, finally, to virtually any certificate or degree-seeking student attending an institution of higher education.

On average, students who borrow to help pay for postsecondary education expenses will receive a significant return on investment. But students who borrow and drop out, or complete a substandard program of study, do not see the same gains achieved by a student that completes a high-quality program of study. The consequences of this can be seen in the data: student loan borrowers who drop out or complete a program at some institutions are more likely to default on their student loans.[15]

The federal government looks to accrediting agencies to assure a minimum level of performance among institutions that participate in the federal student aid programs to prevent exposure of borrowers and taxpayers to unacceptable levels of risk. However, there are reasons to believe that many institutions are not meeting even the most basic levels of performance that could reasonably be expected of our nation's colleges, universities, and other postsecondary education institutions.

One way to illustrate the problems associated with the lack of minimal performance standards is evident when graduation rates of HEA-eligible institutions are examined. Nearly one-third of all institutions accredited by an agency recognized by the secretary of education that are eligible to participate in the federal student aid programs have graduation rates below 40 percent, with an additional 24 percent of these institutions having graduation rates between 40 and 60 percent (fig. 9.2).

Just over half of all colleges and universities accredited by regional accreditors have graduation rates at or below 40 percent. Among the institutions accredited by the two accreditors under the general moniker of the Western Association of Schools and Colleges (WASC), one (the Senior Colleges and Universities Commission [WASC-SCUC]) had the smallest share, with 20 percent of the institutions they accredit with graduation rates below 40 percent, while the other (the Accrediting Commission for Community and Junior Colleges [WASC-ACCJC]) had the largest share, with graduation rates below 40 percent for 93 percent of the institutions they accredit. At the other regional accreditors, the share below 40 percent ranged between 38 percent (New England Association of Schools and College: Higher Education) and 59 percent (Southern

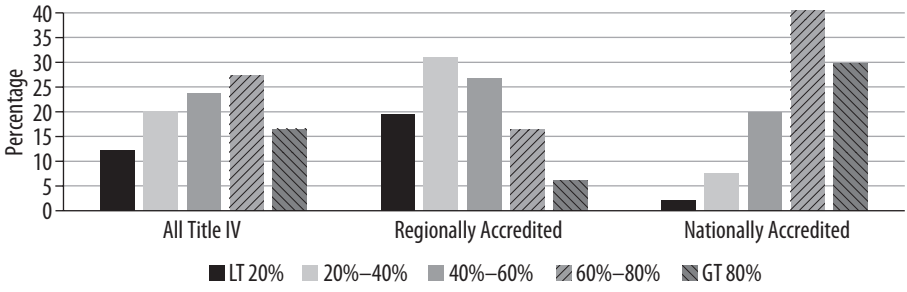

Figure 9.2. Distribution of Graduation Rates by Type of Accrediting Agency for Title IV Participating Institutions of Higher Education. Source: National Advisory Committee on Institutional Quality and Integrity, June 2016.

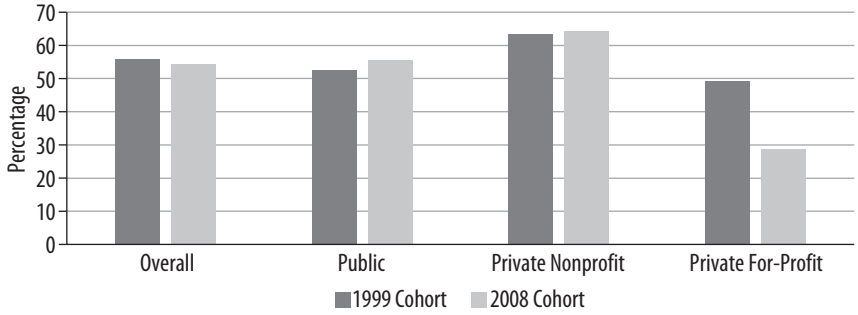

Figure 9.3. Graduation Rates at Four-Year Institutions of Higher Education, 1999 and 2008 Cohorts. Sources: IPEDS.

Association of Colleges and Schools [SACS]).[16] The remaining regional accreditors oversee both two- and four-year colleges, resulting in lower graduation rates than the WASC-SCUC.

While the risk of students with loan debt dropping out is common across institutional sectors, dropping out is not. Students who attend four-year for-profit colleges bear a much higher risk of dropping out when compared to their peers at public and private nonprofit four-year colleges (fig. 9.3). Figure 9.4 shows the completion rate for two-year and less-than-two-year institutions.

Borrowers who fail to graduate from a postsecondary education institution face a number of challenges that place them at risk for student loan default. Students who do not complete—whether with student loan debt or not—are at risk from the effects of foregone potential income while pursuing a postsecondary education. Economists refer to this foregone income as the opportunity costs of going to postsecondary education. One way to think about foregone income is the amount the student would have earned if not enrolled in college. Although foregone income can be reduced by a student working full- or part time while in college, this employment can adversely impact persistence and degree or certificate completion. Some economists believe that the indirect costs of higher education, including foregone income, could exceed the direct costs, including tuition and fees, books and supplies, and so on, but, for the most part, those who graduate from college will realize earnings that will compensate for the direct and indirect costs of higher education. It is less clear whether those who drop out will be as fortunate, and it certainly places them at greater risk of failing to be able to recover their investment of time and money from higher education.

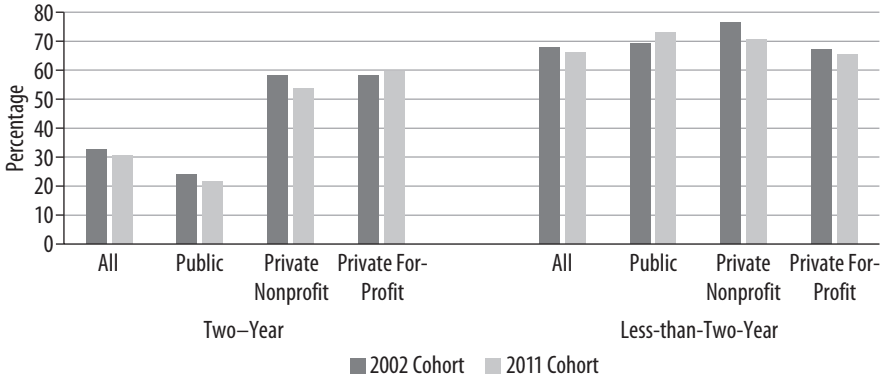

Figure 9.4. Graduation Rates at Two-Year and Less-than-Two-Year Institutions of Higher Education, 1999 and 2008 Cohorts. Sources: IPEDS.

Some borrowers drop out for personal reasons not under the control of the institution. But many others leave because institutions provided inadequate academic and other nonfinancial support. These borrowers bear the brunt of the failure of higher education institutions to adequately and affordably serve the students they enroll. If these students are unable to repay what they have borrowed, they risk facing significant negative consequences of failing to repay those loans, for example, losing eligibility for significant federal benefits, including access to deferment, forbearance, repayment plans, and additional financial aid; having federal and state tax refunds withheld; damaging their credit rating, which will impact a borrower's ability to buy a car or house or get a credit card.

Students who attended regionally accredited institutions of higher education were more likely to be able to repay their student loans when compared to those enrolled in national accredited institutions. Among the regionally accredited institutions, students who attended institutions accredited by WASC-SCUC seemed to have the easiest time repaying their federal student loans, while WASC-ACCJC and SACS seemed to have the greatest difficulty.[17]

While some within the academy continue to dispute that helping students get a job is the ultimate goal for higher education, the student loan system means that employment outcomes cannot be ignored. Graduates must earn enough to repay their loans. Therefore, the higher education system must fuel the economy with well-prepared graduates who have the knowledge, skills, and abilities necessary to fill the jobs of today and tomorrow.

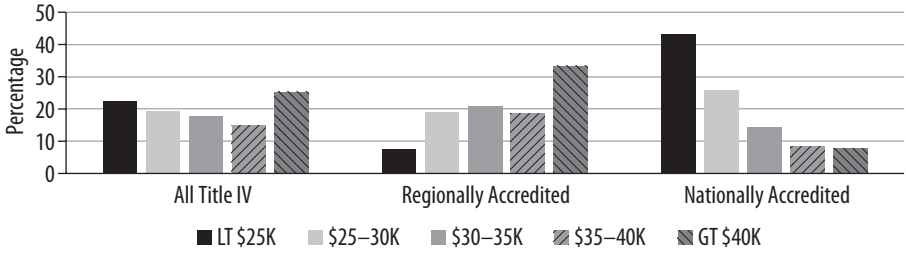

Figure 9.5. Distribution of Median Earnings of Graduates by Type of Accrediting Agency for Title IV Participating Institutions of Higher Education. Source: National Advisory Committee on Institutional Quality and Integrity, June 2016.

In this regard, institutions that are regionally accredited show significantly better outcomes for their graduates than those that are nationally accredited. Of the nationally accredited institutions, 43 percent had median earnings for graduates of less than $25,000, and only 8 percent had median earnings for graduates over $40,000 (fig. 9.5). By contrast, of the regional accredited institutions, 8 percent had median earnings for graduates of less than $25,000, and one-third had median earnings for graduates over $40,000.[18]

Among the regionally accredited institutions, those accredited by WASC-SCUC fared the best, with only 2 percent of the institutions having median earnings for graduates of less than $25,000 and 75 percent having median earnings for graduates over $40,000. By contrast, 12 percent of the institutions accredited by SACS had median earnings for graduates of less than $25,000 and only 22 percent had median earnings for graduates over $40,000.[19]

To be effective in managing risk, accreditation—along with the other elements of the Triad—must consistently and effectively identify poor-quality educational programs and institutions in order to protect students and taxpayers. This is an enormous responsibility that requires a robust accreditation system or an alternative system that assures students and taxpayers better outcomes.

Elements of a New Quality Assurance System Designed Specifically to Mitigate Risk

In 2013, President Obama proposed the creation of a college rating system to augment the current Triad-based approach anchored by accreditation. In announcing this new approach, the president stressed that the value of higher education cannot be reduced to a single value, such as the median or average

earnings of graduates. Indeed, then secretary of education Arne Duncan stressed that the assessment of the value of a higher education institution needed to take into consideration a number of elements that include access, affordability, and outcomes.[20]

In response, the Center for American Progress (CAP) proposed an alternative quality assurance system that would provide incentives for institutions to strive to improve their performance on key metrics and focus increased aid to Pell Grant recipients attending high-performing colleges. CAP concluded that a few key metrics must be included in the accountability system:

- Whether the institution provides access to underserved populations, including students from low- and moderate-income families, and students from groups underrepresented in higher education, such as those from rural communities or minorities.
- Whether the institution is affordable—after the consideration of federal, state, and institutional grants—to students from low- and middle-income families, including veterans, the homeless, and foster youth.
- Whether the institution retains and graduates students from low- and middle-income families on time—two years for an associate's degree and four years for a bachelor's degree.
- Whether graduates successfully go on to graduate school, professional education, or enter the workforce and earn an adequate amount to meet the needs of their families and comfortably repay their student loans, either through service or regular monthly payments.

The ranking system suggested by CAP is summarized in table 9.2.[21]

As envisioned by CAP, the new value-based system would exist alongside the current system of peer review–based accreditation. Only institutions that had unacceptable performance on all metrics would be subject to loss of eligibility to participate in the financial aid programs, even if they continued to be accredited. Indeed, institutions in the bronze category might use the resources provided to improve performance by procuring additional support from accreditors.[22]

However, if the goal is to mitigate risk, a value-based system with strong performance outcomes could operate totally separate from accreditation, with institutions being eligible (or ineligible) solely based on performance against the metrics. Indeed, this second approach—sometimes referred to as decoupling—likely would be effective at helping to manage the risk of the federal student aid system. Such an approach would also better align the federal student aid system

Table 9.2. Value-Based Approach to Quality Assurance

Rating	Basis for rating	Reward	Penalty
Platinum	Top-performing institutions with best performance against all four metrics	Students attending platinum institutions could receive additional grant support and unsubsidized student loans.	None
Gold	Strong performance on three core metrics: (1) access, (2) affordability, and (3) retention and graduation, and acceptable performance on remaining metric	Students attending gold institutions could receive additional unsubsidized student loans.	None
Silver	Acceptable performance on all metrics	None	None
Bronze	Acceptable performance on access and affordability metrics. Unacceptable performance on one or both of the other metrics.	Institutions to receive support to improve performance on retention, graduation, and the graduate school, professional school, and employment metrics.	Institutions required to buy bonds supporting a percentage (equal to a fraction of the institution's cohort default rate) of their students' federal direct loans.
Lead	Unacceptable performance on access and affordability metrics. If unacceptable performance on retention and graduation or graduate school, professional education, or entry to workforce metrics, would lose eligibility to participate in the financial aid programs.	None	Institutions required to buy bonds supporting a percentage (equal to the institution's cohort default rate) of their students' federal direct loans.

toward the government-wide requirements established by the Government Performance and Results Act.

The Obama administration worked to apply metrics to programs that, under the HEA of 1965, must lead to gainful employment in a recognized occupation. These "gainful employment" programs include nearly all programs offered by for-profit institutions of higher education and nondegree programs at all other institutions. In January 2017, ED released data that showed that nearly 10 percent of those

programs failed to ensure that students who completed the program had earnings that ensured that annual loan payments would fall below the required levels (30 percent of discretionary income or 12 percent of total earnings).[23] This effort was exceedingly controversial, but it ultimately was successful in identifying programs that were possibly—even likely—harmful, even to students who completed the program.

Any effort to create rigorous performance standards for institutions participating in the federal student aid and education tax credit systems would also be controversial and face a difficult path to implementation. However, there are already-existing examples of value-based approaches to eligibility and funding. For example, eligibility requirements for support under the institutional aid programs have parallels to the suggested access and affordability measures.[24] In addition, a performance-based funding formula has been used to allocate funds among historically black colleges and universities (HBCUs) that demonstrate that such approaches are possible, even as they are controversial.[25] Perhaps providing a base level of funding to which each HBCU was entitled helped to make a performance-based funding formula palatable.

Conclusion

The federal government relies on accreditation to assure the quality of postsecondary education programs supported with taxpayer funds. In doing so, it delegated a tremendous responsibility to a system of private, nonprofit organizations that attempt to encourage continuous improvement at the nearly 7,200 institutions of postsecondary education that make up the nation's higher education system, and they play a critical role in managing risk for the more than 27 million students during the 2014–2015 academic year as well as the federal, state, and local taxpayers who help finance the system.[26]

The accreditation system relied on today was established to simply signal whether an institution should accept a degree or academic credits from another institution. As such, the accreditation system was not created to ensure compliance with minimum performance expectations, nor was it created to assign appropriate levels of risk among the various actors in the broader higher education system between the federal, state, and local government, and institutions, lenders, or students and families.

If the HEA had been written today, a very different system of quality assurance would likely be created that would reflect an appropriate allocation of risk among students and families, institutions, states, and the federal government.

One is left to wonder if President Johnson would look back at the progress that has been made in higher education and suggest a set of performance expectations that all participating institutions in the federal student aid system must meet based on criteria suggested in his signing statement:

1. Does the education received by each student from the institution provide a path to achievement and fulfillment?
2. Does the education, research, and service of the institution contribute to making the nation free and civil?
3. Does the education, research, and service of the institution contribute to peace?

It is not clear from the performance of accredited institutions that accreditation has been effective in addressing these questions. Further, while the federal government has been relying on accreditation to mitigate risk, it is not clear that that strategy has been effective. The federal government has been applying bandages to the current system including:

- an experiment to determine whether accreditation stands in the way of appropriate innovation,
- the creation of income-based repayment plans to help students and families manage risk,
- the development of gainful employment metrics to assess the outcomes of postsecondary education, and
- the dissemination of college scorecards to help better inform student choice.

Bandages are not enough. The country does not have the luxury of delaying in making meaningful changes to the current quality assurance system for postsecondary education. The current system does not provide reasonable assurances of a quality education for many students receiving federal student aid and has not protected them—or the taxpayer—from consequences of excessive debt.

NOTES

Epigraph. President Lyndon B. Johnson's Remarks at Southwest Texas State College (now Texas State University–San Marcos) upon signing the Higher Education Act of 1965, November 8, 1965, accessed April 15, 2017, http://www.txstate.edu/commonexperience/pastsitearchives/2008-2009/lbjresources/higheredact.html.

1. The HEA is best known for the student aid programs authorized under Title IV of the act. However, the HEA has also authorized programs of teacher preparation, institutional support, graduate fellowships, foreign language and area studies, and innovation.

2. "Trends in Student Aid 2015," *College Board*, accessed April 15, 2017, http://trends.collegeboard.org/sites/default/files/trends-student-aid-web-final-508-2.pdf.

3. Government Performance and Results Act of 1993, Public Law 103-62, https://www.gpo.gov/fdsys/pkg/STATUTE-107/pdf/STATUTE-107-Pg285.pdf.

4. Tom Baker and David Moss, "Government as Risk Manager," *New Perspectives* (2009): 87.

5. US Department of Education, National Center for Education Statistics, "2011–12 National Postsecondary Student Aid Study (NPSAS:12)" (Washington, DC: National Center for Educational Statistics, 2013).

6. David A. Bergeron, Elizabeth Baylor, and Antoinette Flores, "A Great Recession, a Great Retreat: A Call for a Public College Quality Compact," *Center for American Progress*, October 27, 2014, https://www.americanprogress.org/issues/higher-education/report/2014/10/27/99731/a-great-recession-a-great-retreat/.

7. US Department of Education, National Center for Education Statistics, "2011–12 National Postsecondary Student Aid Study."

8. Joe Valenti and David Bergeron, "How Qualified Student Loans Could Protect Borrowers and Taxpayers," *Center for American Progress*, August 2013, https://www.americanprogress.org/issues/higher-education/report/2013/08/20/72508/how-qualified-student-loans-could-protect-borrowers-and-taxpayers/.

9. Median debt should not be confused with average debt. Median debt includes a zero debt for graduates who do not borrow. Average debt typically excludes those who do not borrow and is, therefore, higher than the median debt. Median debt is used in this chapter because it more accurately reflects the experiences of the typical graduate. Other measures are offered, where possible and appropriate, to give expression and context to those with other levels of student loan debt.

10. US Department of Education, National Center for Education Statistics, "2011–12 National Postsecondary Student Aid Study."

11. Ibid.

12. Ibid.

13. James N. Wetzel, Dennis O'Toole, and Steven Peterson, "Factors Affecting Student Retention Probabilities: A Case Study," *Journal of Economics and Finance* 23 (1999): 45–55.

14. Yeseul Choi, "Debt and College Students' Life Transitions: The Effect of Educational Debt on Career Choice in America," *Journal of Student Financial Aid* 44, no. 1 (2014): 3.

15. Mary Nguyen, "Degreeless in Debt: What Happens to Borrowers Who Drop Out," *EdSector*, February 23, 2012, http://www.air.org/edsector-archives/publications/degreeless-debt-what-happens-borrowers-who-drop-out.

16. "Recognized Institutional Accreditors: Federal Postsecondary Education Data and Student Aid Data," National Advisory Committee on Institutional Quality and Integrity, June 2016, http://www2.ed.gov/admins/finaid/accred/accreditor-dashboards.pdf.

17. Author's summary of the data provided by the National Advisory Committee on Institutional Quality and Integrity, June 2016.

18. Author's summary of the data provided by the National Advisory Committee on Institutional Quality and Integrity, June 2016.

19. Ibid.

20. Arne Duncan, "Remarks on Assessing Value and Opportunity in Higher Education to the TIME Summit on Higher Education New York, NY," September 20, 2013, http://www.ed.gov/news/speeches/assessing-value-and-opportunity-higher-education.

21. David A. Bergeron, "What Does Value Look Like in Higher Education," *Center for American Progress*, January 29, 2014, https://www.americanprogress.org/issues/education/news/2014/01/29/83094/what-does-value-look-like-in-higher-education/.

22. Ibid.

23. Andrew Kreighbaum, "Overburdened with Debt," *Inside Higher Ed*, January 10, 2017, https://www.insidehighered.com/news/2017/01/10/federal-data-show-hundreds-vocational-programs-fail-meet-new-gainful-employment.

24. Higher Education Act of 1965, Pub. L. No. 89-329 § 312 (b) (1965).

25. Higher Education Act of 1965, Pub. L. No. 89-329 § 324 (1965).

26. Scott Ginder, Janice Kelly-Reid, and Farrah Mann, "Postsecondary Institutions and Cost of Attendance in 2015–16; Degrees and Other Awards Conferred, 2014–15; and 12-Month Enrollment, 2014–15: First Look (Preliminary Data) (NCES 2016-112)," US Department of Education (Washington, DC: National Center for Education Statistics, 2016). Accessed September 20, 2016, http://nces.ed.gov/pubsearch.

Accreditors as Policy Leaders

Promoting Transparency, Judgment, and Culture Change

Jamienne S. Studley

The previous chapter discussed how accreditation can be used to support the agenda of policymakers. Here the idea is put forward that accreditation has a unique role to play in developing policy and has specific competencies that can make it an especially effective change agent.

Accreditors can advance the national higher education agenda for access, affordability, and outcomes by leveraging their natural but underutilized strengths. Beyond their essential responsibility for assessing compliance with core standards, accreditors have three special capacities—call them gifts—they can and should draw on to protect students and taxpayers, and increase the value of higher education to the nation. Those distinctive and potentially powerful assets are their capacity to make transparency meaningful and sensible, especially about outcomes; judgment and context; and experience leading culture change. To be relevant and constructive leaders, accreditors must be willing to invest those assets strategically and boldly.

Accreditors will find allies to support their use of their gifts. Policymakers intent on strategically expanding the reach of education and the value of tax dollars should enlist accreditors in that project (and will probably be willing to trade some flexibility and relief from cumbersome review of inputs in exchange for the help). Higher education leaders, who sometimes rightly criticize accreditors, should recognize that they are at least cousins in the academic and learning enterprise. Smart innovators offering new learning options should appreciate that they

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are well served by meaningful accreditation. Accreditation and other quality assurance and performance standards guard against competition from substandard providers, which is especially valuable as the historic monopoly of institutions of higher education is loosening. And accreditors themselves may want to seize the chance to be leaders and active participants in the reform agenda, rather than be prodded and disparaged.

A Call to Leadership

Accreditation has two fundamental goals: the historic one of providing a peer feedback system to promote improvement and the more recent and public one of assuring that institutions meet minimum, yet rigorous, baseline standards sufficient to participate in federal financial aid programs. That second job—applying standards—is essential to the health of the higher education and student aid systems, and also to our confidence in accreditors and accreditation.

Beyond these two traditional functions is a third role for accreditors. This third role would use their natural assets to help lead the way in this new and emerging policy context for quality assurance in higher education. Of course, that expansion will only be possible if accreditation increases its credibility as an effective gatekeeper across all sectors, successfully disciplining substandard institutions before they disserve students and waste taxpayers' investment. Even better, if accreditation is perceived as efficient and innovative in that arena, it will be even more welcome in shaping broad policy and quality directions.

The case for change and the need for responsible leadership in higher education is clear. The nation must do a better job of delivering quality postsecondary education more widely, efficiently, and economically, a set of connected goals repeatedly expressed by President Barack Obama as "access, affordability and outcomes."[1] America invests billions of dollars in student aid to advance the health of the nation's economy, our commitment to opportunity, and democracy and civic engagement. Right now, all of those lofty goals are severely tested. The economy is growing, but slowly and unequally. Completion of quality postsecondary education, a gateway to opportunity, is similarly inequitably distributed across the population.[2] Civic knowledge and engagement are distressingly low.

Various actors—institutions, students, Congress, each new administration, as well as states, business, and justice advocates—turn to accreditation to carry out a range of policy objectives they think will improve the situation, however they define the problems. The improvements they have in mind cover a wide expanse, including increasing access and diversity; promoting affordability, student

understanding of the financial realities of attending college, and wiser choices and behaviors involving borrowing and repayment; articulating ambitious and comparable learning outcomes; assuring reliable completion and transfer rates and broad workforce preparation; protecting the public good and democratic responsibilities of higher education and its graduates; promoting innovation; and welcoming new provider types.

Many policy ideas have been initiated or floated to increase higher education accountability for delivering results. They range from increasing the flow of meaningful information, changing approval standards and institutional behavior, and inviting new providers to participate in federal aid programs if they can achieve desired results to creating public incentives and private market rewards.[3] These initiatives have met with varying degrees of enthusiasm and success.

Accreditors have more opportunity than they realize, or have seized, to shape the future. They are in a good position to develop and implement strategies to advance access (which should always be read as access to education that results in value to students), affordability, and outcomes. They already command significant and valuable higher education resources (in varying degrees across agencies, to be sure) in the form of attention and expertise across their member institutions, intellectual capital concerning every aspect of institutional capacity and quality, and time and financial resources. The accreditation community could usefully deploy those unique assets to protect students and taxpayers, and increase the value of higher education to the nation.

Accreditation Competency #1: Promoting Transparency through Clearer Measures and More Open Windows

Transparency is one of the top strategies for promoting accountability and market incentives for improvement. But more data is only part of the puzzle. Transparency is designed to help consumers make better individual choices and institutions to benchmark, compete, and improve. But transparency is only as valuable as the content of the information that is shared, especially about critical outcomes of postsecondary education. And transparency is more effective the wider the consensus around the significance and meaning of the information.

Over the past decade, a series of new and expanded federal information resources—College Navigator and notably the enhanced College Scorecard—were created to increase transparency on the theory that ready access to more information can promote stronger accountability and wiser decision-making.[4] For even longer, commercial publications and organizations have generated rankings

and other information resources that set out to increase information about colleges and universities.[5] Information can help students and their families make better choices using factors of importance to them, even within the limits of an imperfect market. Less visibly, but often even more significant, more and better information can help institutions benchmark against peer institutions to power up their internal analysis of results and drive improvement through both organizational learning and market competition.[6]

However, developing indicators that are credible and respected is critical. This is a difficult, sensitive challenge, as is evident from the slow and often contentious design process for federal, voluntary, or published higher education data compilations. That is where accrediting agencies can come in. They have experience designing standards and definitions for accreditation, involving their membership in a consensus-building process. Their field experience is a laboratory for understanding what metrics are truly useful windows into institutional effectiveness. Many agencies represent diverse categories of institutions and programs, which gives those accreditors a valuable cross-cutting perspective and important independence from any one sector.

Moreover, accrediting agencies have a unique hybrid nature as creatures of higher education that also perform a regulatory function and responsibility. That dual nature may be useful and stabilizing in the coming period of shifting and contested policy. They are outside the formal political process and may be able to provide some measure of continuity and long-term perspective compared to a federal agency or Congress. Accreditors, for example, are in an ideal position to advocate for balancing the value of outcome measures with the need for sensitivity to factors that limit the value of outcome metrics, such as low-paid employment fields, stubborn workforce bias in compensation, and gaps in data. In another vein, they can help chart a course that balances the attractiveness of educational technologies or large-scale providers that may seem economical with historic lessons and long-term perspective on accessibility and genuine returns on education investment.

Accreditors should not miss the chance to be more active in filling the need for strong and comprehensive performance measures, as the landscape continues to shift from input-based measures for evaluating higher education quality toward outcome measures reflecting student learning and, ultimately, to longer-term measures of completion, employment, and personal success.[7] Some accreditors, especially professional and specialty accreditors, have used outcome measures for many years and have experience in designing and monitoring results.[8] The drive

toward outcomes has accelerated to incorporate such measures into the expectations of all accreditors and in transparency initiatives designed for the public and for institutional improvement. This is, of course, a fundamental shift, from determining whether an institution has the capacity to deliver quality education to testing whether its students have, in fact, achieved stated results.

This is an opportunity for accreditors to be active partners in design, use, and refinement of transparency and outcomes tools, leveraging their collective expertise in the field and perspective across institutional types. This is an invitation for accreditors to exchange ideas more across their own sectors, where cross-fertilization and learning from one another could be valuable. There is work to be done on improving existing outcomes measures and also on developing additional measures to the point that they are informative and widespread enough to be incorporated into standards and student information.

In addition to helping develop reasonable and useful metrics, accreditors could help make information more comprehensible to students and the general public. This audience has been trained to know that whether a school is accredited is important, at the least for their personal eligibility for financial aid, but most know precious little else about accreditation and what it conveys. Accreditors should want students and the public to be clearly and accurately informed about what goes into these complex decisions. Right now, prospective students are left to rely primarily on marketing by schools themselves, or they might find their way to assorted guides, ratings, and publications with varied self-interests, to word of mouth and social media, or to explanatory efforts by higher education associations and the federal government. There is space for credible explanations about how to gather, use, and compare information about higher education institutions that accreditors would be in a good position to provide or collaborate on with others. Or accreditors could engage directly with the designers of federal resources such as the Scorecard, public interest and student groups, and publications in designing sensitive and contextualized information resources.

There is also widespread agreement that the current array of measures of higher education effectiveness are woefully inadequate, especially to the extent that they overemphasize the important but not exclusive categories of employment, earnings, and debt. Accreditors could work with higher education to explain the concept of return on investment more fully and to generate and test ways to communicate systematically about other variations among institutional outcomes and rewards to postsecondary education. Accreditors also need to be energetic partners with higher education in crafting more useful, subtle, and

widespread measures of student learning outcomes. And evolving a richer and wider set of outcomes (from public service and civic engagement, for example, to life expectancy or resilience in times of economic or other stressors) would serve students and higher education well. Accreditors actively involved in the effort to generate meaningful new measures could draw on their culture change capacity, signaling that this effort is serious and worth the candle.

Increased transparency has also come to accreditation itself. Alongside more information about institutions through student-focused tools, a next logical step was to shine the transparency spotlight directly on accreditation to make its processes and actions more visible and comparable. In fall 2015 to winter 2016, the US Department of Education (ED) organized public information on institutions by accrediting agency to make it easier to compare and highlight variations in accreditors' processes and in the outcomes achieved by their member schools.[9] Accreditors are just beginning to respond to this increased transparency about their own operations and outcomes. These new ways of looking at results reflect an effort to look at the universe of each accreditor's performance without intruding into decisions about individual institutions. Not surprisingly, this has generated not only praise for sharpening oversight but also resistance for distorting the peer-improvement purposes of accreditation.

ED and the federal National Advisory Committee on Institutional Quality and Integrity (NACIQI) are using the recently expanded storehouse of data, much of it derived from the Scorecard, to generate questions about the performance of accreditors, or about the schools they review, without creating bright-line tests for either the accrediting agency or the schools it reviews. The data let ED shine light on and around where a bright line for an institution or agency might be if one existed, but in context and without setting firm or universal high-stakes requirements. This approach leverages transparency and should make for more sophisticated inquiry into results and variations among institutions and accrediting agencies. By looking at outcomes across an agency's cohort of schools, this strategy aims to generate attention to overall performance by a group of schools but does not reach into confidential exchange or determinations about individual institutions. In effect, it says to accreditors: "If you can achieve solid outcomes across the board, ED will not delve into your specific decisions about institutions with low metrics that you have decided are good enough, or improving fast enough under your supervision, to merit continued approval."

The complex nature of the design and application of information about schools, especially regarding their outcomes, affirms the value of a leading role for experts

who guide accreditation with an appreciation for different kinds of institutions and educational purposes and results. Although the job of facilitator, negotiator, or peacemaker is not always a comfortable one, it is one to which accreditors can bring value as new approaches and information are designed and put to use.

Accreditor Competency #2: The Essential Role of Judgment

Transparency is an important tool, but making credible decisions requires judgment as well. Judgment is necessary for teasing out differences among schools where specific line-drawing or imposition of high-stakes consequences would be difficult or inappropriate, given the variety of schools, missions, resources, inputs, and student preparation.

Accreditation initially became part of the federal gatekeeping process because accrediting agencies were already in the field evaluating institutions, but later its role grew when higher education and Congress wanted to be sure that federal education officials did not make judgments about academic matters like curriculum and education policy. Despite uncertainty about accreditors' rigor and the possible conflicts inherent in a peer-driven process, Congress' and academia's reluctance to give discretion about what are considered sacrosanct academic matters to government actors, aka "bureaucrats," is even greater.[10] That responsibility for exercising judgment remains at the heart of the accrediting function.

In developing the College Scorecard, it was apparent how difficult it is to set bright lines for institutional performance across mission, population, and program differences. Accreditation has been allocated the formal responsibility and leeway to make determinations based on school- or program-specific characteristics and history, multiple data sources, and other variables.[11]

Regional accreditors' recent joint commitment to develop and adopt a set of outcome measures that they would use to target their inquiries is a good example of combining metrics and guidelines with flexibility exercised in light of judgment and experience. They are using a threshold graduation rate as an initial indicator that triggers heightened scrutiny while looking to the institution to provide context that may explain why graduation rates are low and how the institution is trying to improve outcomes.[12] It remains to be seen if this "outcome-aware" approach will help accreditors address institutional weakness more effectively to yield wider confidence. If successful, it will be the product of transparency (being clearer about expectations, measures, and results), judgment (the exercise of analysis to distinguish similar situations), *and* transparency *about* judgment (revealing the reasoning that lay behind the decision reached through the exercise of judgment).

Ideally, this marriage of transparency and judgment will yield more nuance and subtlety, and also greater confidence and comfort in accrediting decisions and other quality assessments. That confidence could take the form of explanations providing an overview of how outcome measures are applied and schools close to the margins are assessed, or from specific explanations concerning a particular institution. Either way, the more respect accreditors earn, the better they will be able to lead or contribute meaningfully to such policy initiatives as designing and explaining more nuanced outcome measures, engaging in more explicit and visible peer review across sectors, and, most importantly, explaining their determinations about institutions in the "gray zone" that lies just on either side of a performance watch line.

Much of the need for judgment comes back to the very real variations among schools in their purposes, students, and programs. Throughout development of the College Scorecard, analogies were drawn to competitive diving, which awards points not only for execution but also for the difficulty of the attempted dive.[13] In higher education terms, a school filled with very well-prepared and prosperous students can more easily achieve good outcomes on measures such as graduation, employment, and loan repayment than one whose students received weaker preparation and are financially fragile. In the words of a colleague, "all dives can be beautiful, but some are harder to execute."

As was noted repeatedly in the Scorecard conversation, without this acknowledgment of varying mission and inputs, schools would chase "easy dives"—more well-prepared students or easier fields of study—rather than embrace missions of opportunity or challenging fields of study. Making those complex judgments fairly and credibly is not easy, but it is accreditors' essential contribution to a sensible, tailored quality system. Just as judging beauty and execution in diving requires experienced, well-trained judges, so it is with evaluation of results in higher education. Confidence in accreditors' judgment depends on such factors as assurance of their independence and testing of their reliability. The judges and their processes need to be respected if the decisions they reach about schools are to be taken seriously.[14] Without the exercise of this kind of nuanced judgment, higher education and the nation would suffer.

There is one more way that accreditors could build on their historic judgment and context strengths: they could apply the defining principles of peer review to accrediting agency review. For all their experience helping schools evaluate and learn from one another, agencies do not apply a similar field-wide review and improvement process to agencies across the board. There is no organization

of accreditors that crosses category boundaries (national, specialty/professional, and regional), and the existing categorical organizations do not set membership requirements or evaluate each other. ED does take peer views into consideration in the sense that when it determines whether agencies meet federal requirements it must weigh whether they are widely recognized as authoritative with respect to accreditation.[15] And the Council for Higher Education Accreditation (CHEA), the organization of higher education entities concerned about accreditation quality, has an extensive process for standard setting, review, and recognition of accrediting agencies.[16] But there is no cross-cutting, widely visible peer-improvement process, no explicit element of peer review in the federal process, and no systematic process for securing peer assessments from other agencies as part of the department's review for agency recognition. That void is puzzling. Given that accreditors are criticized with a broad brush, would it not be natural for them to try to identify and cull out bad agency apples, and to work together to get their baseline results up across the board?

Accreditor Competency #3: Leadership and Culture Change

Accreditation is no stranger to change leadership. Although the accreditation community is rarely given credit, it has successfully led the broad higher education initiative to incorporate student learning assessment and outcomes into agency standards. This was a natural evolution of accreditation's commitment to continuous improvement (hastened, no doubt, by pressure from the Spellings Commission[17] and the Obama administration but also supported by encouragement from within the academy by numerous players, including Association of American Colleges & Universities (AAC&U) and a new generation of faculty).[18] While accreditation-wide adoption of meaningful student learning outcomes is a significant, complex, incomplete, and still-evolving process, it shows the ability of the accreditation community to rethink its fundamental expectations, to educate the field, and to initiate real change. A new stage of culture change could be imagined when all accreditors embrace outcome measures as inherent elements of peer expectations for understanding and improving institutional quality. That change could also be a path to reducing input and process requirements, not just a demand forced on them by overzealous regulators or troublesome magazines.

Along with the most common outcomes metrics around learning, completion, and employment, accreditors can seize the moment to accelerate movement to incorporate larger measures relating to affordability and access as well. Some may see calls for accreditation to expand attention to affordability and access as

"mission creep," asking it to play outside its natural position of gatekeeping. But let us look to the fundamental role of peer review, which includes evolving to raise standards. Institutions themselves are increasingly setting access, affordability, and outcomes expectations, and competing with one another on these dimensions. In other words, these goals are being defined as appropriate elements of institutional effectiveness and thus becoming contemporary standards for higher education.

There are increasing examples of institutional leadership promoting and relying on outcomes analysis and transparency to foster progress toward access, affordability, and outcomes. The eleven members of the University Innovation Alliance of large public universities, for example, are challenging themselves and collaborating with peers to simultaneously increase access for low-income and first-generation students *and* raise graduation and employment rates.[19] Institutions as varied as Lehigh and Purdue and Willamette and Bates and Franklin & Marshall put career outcomes front and center in setting performance goals. Many schools are looking to outcomes measures involving employment, student and employer satisfaction, and engagement as both internal management tools and also as substantive ways to promote and differentiate themselves. At what point do those practices transition from savvy marketing approaches to standard expectations for responsible peer institutions? That moment may already have arrived.

Culture change that arises within the field, or becomes part of the natural fiber of institutions and disciplines, is hardier than requirements imposed upon them. That is noteworthy at a time of political change. Student learning outcomes have now become part of institutional values and practice, and will be sustained within the academic conversation about effectiveness. Legal rules and requirements that are not embedded in that way are vulnerable to political winds. Learning and other key outcomes that reflect access, affordability, and outcomes will be sustained, too, by applicant, student, alumni, and philanthropic interest and attention.

Of course, a view or practice can become part of the culture as a result of regulation, too, if sufficient consumers come to count on it and providers see its value and build it into their core. For example, the gainful employment rule[20] about expectations for reasonable return on students' and taxpayers' investment was certainly not an organic outgrowth of the career training community. But as responsible providers see value in clearing out the lowest-performing, weakest players in the sector, and find that students are attracted by marketing that promotes official measures of affordability in terms of earnings and repayment, then the changes promulgated by the rule could shape the field, even if the rule is revised or gutted.

In sum, opportunities abound for accreditors to help deepen the sophistication of discussion and share innovations and successes across institutions. That work could further cement changes in educational expectations and practices that advance the interests of students, equity, and efficiency.

As Accreditors Step Up Their Policy Roles

So with these assets for promoting transparency, judgment, and cultural leadership, what does accreditation need to do—or stop doing—to have the credibility and resources to carry out its policy roles? First, the sector as a whole has to be thought of as competent, a watchdog that actually keeps the house safe instead of "failing to bark," as asserted by the *Wall Street Journal* and reiterated by former secretary of education Arne Duncan.[21] Schools and accreditors that do not pass muster must be eliminated, and indeed be *seen* to be eliminated and the reasons for such actions understood.[22]

Second, accrediting agencies would need to increase their sheer human capacity to take on or ramp up for these wider purposes, such as designing and evaluating outcome measures, explaining accreditation and institutional outcomes and returns to students, or shaping important cultural transformations. Resources might be freed up if review processes successfully shift away from cumbersome input reviews to focus on outcomes within a risk-differentiated context. The volunteers whom accreditation now leverages to perform the whole inspection process might also welcome engagement in some of these broader policy conversations.

That said, there is one policy role I would like accreditation to relinquish. There is tension between the responsibility of accreditors to assure adherence to basic operational and learning standards and, by contrast, their consideration of the effects of their decisions. Accreditors understand that negative findings or ultimate sanctions can affect the fate of a school. Further, they know that a decision to sanction some schools enrolling large numbers of students may affect those who are frequently the least-advantaged students, educationally and financially, and who may have few other options. Paying attention to what happens to students comes naturally to the educators who manage accreditation, and it is a point likely to be pushed hard by any school at risk of restrictions or denial, whatever its motivation and true merits. But it can be both risky and confusing for accreditation to take survival effects into consideration, putting too much burden on accreditors to try to grade quality and also anticipate policy consequences.

That is by no means to deny the importance of students' interests. But it is the job of others (notably ED and the states, ideally aided by philanthropy and other

education institutions) to assure the existence of sufficient options for students to get a good education. The job of accreditors is to uphold standards. If accreditors "pull their punches" in judging adherence to standards out of concern that students might or will be left at sea if a particular school fails or closes, that muddies the waters. Folding in those factors makes it impossible to know whether a school actually passed the accreditation hurdles, and whether standards were applied appropriately and consistently.

Accreditors should apply their standards and let the public actors balance the multiple competing factors. This can be viewed as the difference between the function of grading a spelling test—someone has to record errors faithfully, even if it means that the poor speller fails the exam—and deciding how to use the test results. The grader's job is to assign points based on words spelled correctly. It is a separate function to decide *in context* whether the best result is for the student to repeat the test, get tutoring, change classes (and if so, who will be responsible for making that happen), or fail the course.

In this context, then, accreditors have the responsibility to exercise their expert judgment about the factors they *are* supposed to evaluate, but impact on students in the event a school closes is not one of those factors. Such restraint is not easy to exercise, though, so this is one of many reasons that it is important for the triad of accreditors, states, and the federal government to function effectively.[23] This allocation of different responsibilities needs to be clear across the triad, with information about potential sanctions shared and consultation held among the entities—federal, state, and accreditor—as early as possible so they could arrange more successfully than has been the case to protect students.

Beyond Accreditation to Leadership

With all the challenges facing higher education, it is natural to ask every player with commitment, knowledge, and experience to take on as broad and significant a role as it is able. Accreditors have skills and assets that qualify them to contribute to critical areas of policy that promote opportunity and effectiveness. They can and should design more effective performance metrics and help students and institutions know how to use them, clearly stake out the territory in which their informed judgment should hold sway, and influence institutional cultures in the direction of access, affordability, and outcomes.

Today, in the midst of dramatic changes in expectations for results, new providers and learning models, and perceptions of postsecondary education, leadership by accreditors and the credibility of their decisions matter more than

ever. And "more than ever" also encompasses a new political reality. Accreditation and accreditors now may be among higher education's few allies as standard bearers for education quality, student access, rich (not superficial) measures of student success, and potentially for the value of some forms of higher education at all. For all the tension and debate between accreditors (and higher education leaders generally) and the Obama-Duncan-King-Mitchell administration over strategy, tactics, allocation of responsibility, and timing, they shared fundamental beliefs about and commitment to the value of education, the need for oversight, and the responsibility and potential for higher education to serve national, civic, cultural, and scientific ends. For at least eight years, accreditors have portrayed ED as being the strict cop demanding more intensity on the minimum standards beat. If the executive branch becomes a weaker or absent cop, or is constrained by congressional oversight or law changes, accreditors owe it to students and to higher education to continue the push for greater rigor and urgency themselves. By doing so, accreditors would serve the nation and higher education while also shaping policy and enhancing their influence.

NOTES

1. Remarks by President Barack Obama on college affordability, University at Buffalo, Buffalo, NY, August 22, 2013, https://obamawhitehouse.archives.gov/the-press-office/2013/08/22/remarks-president-college-affordability-buffalo-ny.

2. See David Leonhardt, "The American Dream, Quantified at Last," *New York Times Sunday Review*, December 8, 2016, https://www.nytimes.com/2016/12/08/opinion/the-american-dream-quantified-at-last.html?mcubz=3.

3. See "Higher Education Accreditation Concepts and Proposals," Senate HELP Committee, n.d., https://www.help.senate.gov/imo/media/Accreditation.pdf; Senators Warren, Durbin, and Schatz, The Accreditation Reform and Enhanced Accountability Act; Education Counsel, "Framework for Risk-Informed, Differentiated Accreditation," http://educationcounsel.com/?publication=framework-risk-informed-differentiated-accreditation; and other recommendations throughout this volume. Despite immense criticism and suggestions for reform, the federal government and institutions have an investment in continuation of the accreditation model. That investment is structural and practical, in the sense that the public oversight function is constructed on a platform built around accreditation. Even congressional advocates for substantial changes in quality assurance are unlikely to be prepared to assume the full expense of managing the system or to risk complete reliance on untested quality assurance systems or actors.

4. The resources are located at https://collegescorecard.ed.gov and https://nces.ed.gov/collegenavigator/.

5. See varied commercial periodicals that rank and rate institutions of higher education, including *Washington Monthly*, *Times Higher Education*, and *US News*, which feature annual rankings, as well as books published by the Princeton Review and many others.

6. "Better Information for Better College Choice and Institutional Performance," US Department of Education, September 2015, updated January 2017, https://collegescorecard.ed.gov/assets/BetterInformationForBetterCollegeChoiceAndInstitutionalPerformance.pdf; "Using Federal Data to Measure and Improve the Performance of US Institutions of Higher Education," Executive Office of the President of the United States, September 2015, updated January 2017, https://collegescorecard.ed.gov/assets/UsingFederalDataToMeasureAndImprovePerformance.pdf.

7. In 2015, the WASC Senior Commission on Colleges and Universities, a regional accreditor, introduced an innovative and creative treatment of completion data in its Graduation Rate Dashboard (https://www.wscuc.org/resources/about-the-graduation-rate-dashboard). See also "Recognized Institutional Accreditors: Federal Postsecondary and Student Aid Data," US Department of Education, https://www2.ed.gov/admins/finaid/accred/accreditor-dashboards.pdf; *Gallup-Purdue Index Report 2015*, www.gallup.com/reports/197144/gallup-purdue-index-report-2015.aspx; "A Test of Leadership: Charting the Future of US Higher Education," US Department of Education, http://www2.ed.gov/about/bdscomm/list/hiedfuture/reports/pre-pub-report.pdf.

8. "National and Programmatic Accreditor Summary of Student Achievement Standards," US Department of Education, https://www2.ed.gov/admins/finaid/accred/studachievementstds-summary.doc.

9. "Department of Education Advances Transparency Agenda for Accreditation," US Department of Education, https://www2.ed.gov/admins/finaid/accred/exec-actions-factsheet.doc. For subsequent steps to increase transparency, outcome focus, risk-based reviews, and coordination, see https://www.ed.gov/accreditation.

10. See Philip K. Howard, *The Death of Common Sense* (New York: Random House, 1995) on distrust of bureaucracies and regulators.

11. An exchange at the December 2015 meeting of NACIQI between committee member Rick O'Donnell and Barbara Brittingham, CEO of the New England Commission on Higher Education Accreditation, speaks to the judgment element that is core to accreditors' analysis. National Advisory Committee on Institutional Quality and Integrity (2015, June 25). [Meeting transcript], https://sites.ed.gov/naciqi/files/naciqi-dir/2015-spring/naciqi-transcripts-06252015.pdf, 174–177.

12. "Regional Accreditors Announce Expanded Review of Institutions with Low Graduation Rates," Council of Regional Accrediting Commissions, press release, September 21, 2016, http://www.nwccu.org/Pubs%20Forms%20and%20Updates/Forms/PDF%20Files/Press%20Release%20FINAL%209-16-161.pdf.

13. President Walter Kimbrough, "When Rating Colleges, Think Diving," *Inside Higher Ed*, September 30, 2013, https://www.insidehighered.com/views/2013/09/30/essay-suggests-scoring-diving-suggests-path-rating-colleges. For the official diving formula, see "USA Diving Association, Technical Diving Rulebook," Part I, Subpart A, Reg. 104.2, http://www.teamusa.org/usa-diving/resources/rulebook; the complexity of the formula is an interesting parallel to the complicated metrics involved in many of the college ratings systems.

14. One way to increase the perception of independence of accrediting decisions and also to develop opportunities for learning and comparison across regions as well as institutional and program types is to change the accreditation process so that appeals do not go to a fresh team from the same agency but rather to a national, cross-agency appellate process.

15. Acceptance of the Agency by Others, 34 CFR 602.13 (1999).

16. For the Council on Higher Education Accreditation's standards, see "Recognition of Accrediting Organizations: Policy and Procedures," 3, https://www.chea.org/userfiles/Recognition/Recognition-Policy-2010.pdf.

17. "A Test of Leadership: Charting the Future of US Higher Education."

18. Carol Geary Schneider, "Quality, Inequity, and Disruptive Innovation," *Liberal Education* 101/102, no. 4/1 (Fall/Winter 2016): https://www.aacu.org/liberaleducation/2015-2016/fall-winter/president.

19. See the University Innovation Alliance's webpage at: www.theuia.org.

20. Program Integrity: Gainful Employment, 79 FR 64889 (July 1, 2015) (to be codified at 34 CFR 600, 668).

21. Andrea Fuller and Douglas Belkin, "The Watchdogs of College Education Rarely Bite," *Wall Street Journal*, June 17, 2015, https://www.wsj.com/articles/the-watchdogs-of-college-education-rarely-bite-1434594602. Arne Duncan, "Toward a New Focus on Outcomes in Higher Education" July 27, 2015, University of Maryland at Baltimore City, https://www.ed.gov/news/speeches/toward-new-focus-outcomes-higher-education.

22. Secretary John B. King Jr., "Decision of the Secretary," December 12, 2016. Docket No. 16-44-O, www2.ed.gov/documents/acics/final-acics-decision.pdf.

23. See Ewell, chapter 8, this volume.

Crossing Borders

Accreditation and Quality Assurance in a Globalized World

Madeleine F. Green

Higher education policy is often debated from an entirely domestic perspective. However, higher education—and accreditation—operates in a global environment, and there are important international implications of reforming accreditation systems. This chapter looks at accreditation's role in evaluating the international activities of institutions of higher education in the United States, as well as its capacity to extend its reach to quality assurance of foreign institutions.

In the past 20 years, internationalization has become a broad concept in US higher education, including not only student mobility but also faculty mobility, collaborative research and teaching, internationalization of the curriculum, global citizenship, joint and dual degrees, and the establishment of programs and branch campuses abroad. More recently, the term *cross-border* has become a widely used term covering a range of activities. Cross-border education is typically defined as "the movement of people, knowledge, programs, providers and curriculum across national or regional jurisdictional borders. Cross-border education is a subset of 'internationalization of higher education' and can be an element in the development cooperation projects, academic exchange programs and commercial initiatives."[1]

The challenges facing accreditation agencies are not only about how they link to federal aid policies and the student outcomes related to economic development in the United States. Accreditation is also critically implicated in the broader

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globalization of higher education and how a national system of education interacts with the world in an environment of increasing cross-border activities. This chapter looks at accreditation through the lens of internationalization of higher education and considers reforms that are necessary to keep pace with the development of higher education as a multinational enterprise.

To begin, three types of cross-border accreditation activities of US accreditors stand out as particularly important for the future of internationalization and at the same time present challenges and policy choices for accreditors. The first activity, accreditation of non-US institutions and programs by US accreditors, is a very specific way of assuring the quality of a program or institution in another country, since the yardstick for the accreditors is their own standards. The second activity, the development and accreditation of joint and dual degrees, which are already well established in Europe, has the potential for greatly expanding internationalization in the United States. The third cross-border accreditation activity, accreditation of branch campuses and programs abroad, has expanded with the growth of branch campuses largely in the past two decades.[2]

The second section of this chapter looks ahead at possible ways forward to facilitate cross-border quality assurance and recognition. If US higher education is to become increasingly internationalized, intensifying cross-border activities of all kinds, what options are available that go beyond the present policies and strategies of US accreditors? This first section reviews two models for enabling a better coordinated, more global approach to quality assurance and their implications for US accreditors.[3]

Accreditation of Non-US Institutions and Programs Abroad

Regional Accreditation

Most of the regional accreditors limit the practice of accreditation of non-US institutions either to US-style institutions, institutions incorporated in their region, or historical grandfathering. The Western Association of Schools and Colleges-Senior College and University Commission (WASC-SCUC), after opening the door to accreditation of insitutions abroad in 2012, decided two years later not to accept new applications from institutions abroad; the Middle States Association of Colleges and Schools (MSCHE) has done the same. Commission on Colleges of the Southern Association of Colleges and Schools (SACS) is the most active international accreditor, with the most expansive policy. Table 11.1 summarizes the policies of the regional accreditors on accreditation of non-US institutions.

Table 11.1. Policies of Regional Accreditors on Accreditation of non-US Institutions

Accreditor	Accredits abroad	Specific policy for non-US institutions; date of original policy (exclusive of editorial revisions)	Specific policy guidelines
MSCHE	Yes	"Institutions Located Outside the United States"[1]	Institution must be developed under American auspices and chartered in the MSCHE region
HLC	No	n/a	n/a
NEASC	Yes	"Requirements of Affiliation for Free-Standing Institutions Abroad"[2]	Must be US-style institutions, offer instruction in English; programs comparable to regionally accredited institutions in the United States. Must be recognized by appropriate in-country authority (2004)
WASC-SCUC	No	n/a	n/a
WASC-ACCJC	Yes	"Eligibility Requirements for Accreditation"[3]	Eligible institutions outside the United States limited to US territories of Guam and Samoa; Federated States of Micronesia; Commonwealth of Northern Mariana Islands; Republic of Palau, Republic of the Marshall Islands
SACS	Yes	No	Latin America specified as one of its regions in its mission statement; also accepts applications from other international institutions.
NWCCU	Yes	"Accreditation of non-US Institutions Policy"[4]	Accredits US-style institutions; instruction must be in English; should not be in a country on State Dept. Advisory List for Travel or likely to experience unrest; accommodation to cultural difference made at sole discretion of Commission

Sources: Websites of accrediting organizations

1. "Institutions Located Outside the United States," *Middle States Association of Colleges and Schools* (MSACHE), 2004, accessed January 2, 2016, http://www.msche.org/documents/P6A-1-InstitutionsOutsideUS-Revo42613.pdf.

2. "Requirements of Affiliation for Free-Standing Institutions Abroad," *New England Association of Schools and Colleges* (NEASC), 2004, accessed January 2, 2017, https://cihe.neasc.org/sites/cihe.neasc.org/files/downloads/POLICIES/Pp81-Requirements_of_Affiliation_for_Free-Standing-Institutions_Abroad.pdf.

3. "Eligibility Requirements for Accreditation," *Accrediting Commission for Community and Junior Colleges Western Association of Colleges and Schools* (ACCJC), accessed January 2, 2017, https://accjc.org/wp-content/uploads/Eligibility-Requirements-Adopted-June-2014.pdf.

4. "Accreditation of Non-US Institutions Policy," *Northwest Commission on Colleges and Universities* (NCCU), 2010, accessed January 2, 2017, http://www.nwccu.org/Standards%20and%20Policies/Policies/PolicyDocs/Accreditation%20of%20Non-U.S.%20Institutions%20Policy.pdf.

And indeed, the number of institutions abroad with US accreditation is quite small. According the websites of the regional accreditors, they have collectively accredited 46 institutions abroad, up from 38 in 2013.[4]

Although there are few US-accredited institutions abroad relative to the 18,000 higher education institutions that exist worldwide, the recent growth suggests a continuing demand. Institutional motivations for seeking US accreditation may vary. First, they may be US-style institutions, such as the American University of Paris or the American University in Bulgaria (accredited by MSCHE and the New England Association of Schools and Colleges [NEASC], respectively). These private institutions provide a very different model of education than the national universities in those countries, and their legitimacy derives in part from the fact that they are providing an academic model that has been endorsed by US accreditors.

A second reason is to facilitate relationships with US institutions so that students can transfer easily and credits can be recognized as easily as from any US-accredited institution. Developing collaborations, and especially joint and dual degrees, is greatly facilitated when working with another US-accredited institution. And finally, and perhaps most importantly, US accreditation may be seen to confer an international seal of approval, especially when the national quality system is perceived as too weak to be internationally recognized as an affirmation of high academic quality.

Although the regional accreditors have different approaches to accreditation abroad, there are some common principles. In 2001, the Council on Higher Education Accreditation (CHEA) elaborated a set of principles to guide US accreditation agencies as they undertake reviews of foreign institutions or programs from US institutions offered abroad.[5] These principles provide broad guidance on good practice on such topics as having sufficient capacity to undertake the review, working with national quality assurance agencies in countries where the reviews are undertaken, and working with other countries to provide good information about US educational exports so that these countries can avoid accreditation and diploma mills. A separate principle is directed to providers of online and web-based instruction.

Additionally, in order to be recognized by CHEA, accreditors working abroad must comply with the standards outlined in CHEA's recognition policy.[6] First, accreditors must have legal authority to award degrees, irrespective of whether they are US or non-US institutions. It elaborates on this requirement in a footnote, indicating if the country does not grant degrees, the institution should have the support of the local community or other interested communities where they operate.

Additionally, the policy specifies that accreditors must apply their standards in substantially the same way to US and non-US institutions alike. This latter requirement has been applied differently by the various regional accreditors, as the following discussion outlines.

Until recently, the Higher Learning Commission was the only regional accrediting agency that did not accredit institutions abroad. WASC-SCUC ceased doing so in 2014, after having developed a guide for non-US institutions seeking WASC-SCUC accreditation only a few years earlier.[7] At the other end of the spectrum, SACS includes Latin America in its statement of the geographic scope of its activities and also indicates that it is open to applications from institutions of higher education in other regions as well.[8]

Under its charter, MSCHE had accredited institutions abroad that were established under US auspices and chartered in one of the states in its region. In 2002, it instituted a pilot project with nine institutional volunteers from Canada, England, Chile, United Arab Emirates, Taiwan, British Virgin Islands, and Greece.[9] Not all achieved full accreditation, and at the conclusion of the project, further international accreditation activity was put on hold. The policy currently in force indicates that "the Commission accepts applications only from institutions with degree-granting authority from an appropriate governmental organization within the Middle States region, including Delaware, District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, and the U.S. Virgin Islands," although it reserves the right to make exceptions.[10]

The NEASC specifies that the institution must be "American style," have a significant proportion of Americans and others with experience in American higher education on its board, use English as the language of instruction, offer programs comparable to those offered by regionally accredited institutions in the United States, and have a general education program (among other similar requirements).[11]

Like NEASC, the Northwest Commission on Colleges and Universities (NWCCU) stipulates that institutions must be US style, teach in English, and not be located in a country that is on the State Department's Advisory List for Travel or be judged likely to experience unrest.[12]

Program Accreditation

Program accreditors, like regional accreditors, have different rationales for accrediting foreign programs or deciding not to do so. In 2012, the American Bar Association (ABA) decided not to accredit law schools outside the United States.

After protracted debate, the ABA decided that accrediting foreign law schools would divert time and resources. The association was also concerned that the "culture, value, and ethics" of the legal system in the United States could not be translated to students studying in international contexts.[13] The Network of Public Policy, Affairs, and Administration reached the opposite conclusion and uses as its tagline "the global standard in public service education," and refers to itself as "the recognized global accreditor" of graduate education programs in public policy, public affairs, public administration, and public and nonprofit management.[14] It has accredited three international programs in China, Egypt, and Korea.[15]

ABET (formerly known as the Accreditation Board for Engineering and Technology), the accrediting body for engineering programs, and the Association to Advance Collegiate Schools of Business (AACSB International) are highly active in accrediting programs outside the United States. ABET accredits in four areas: applied science, computing, engineering, and engineering technology; its guidelines specify that the process is identical to that used in the United States. According to its website, having starting accrediting outside the United States in 2007, ABET had accredited 475 programs at 95 institutions in 28 different countries by the end of 2015.[16]

AACSB International, which accredits business schools and programs, has clearly included its international activities in its core identity since its name change to include *International* in 1999. The organization has members in 47 countries, and accredits 237 programs outside the United States. This figure represents a substantial increase from the 190 institutions or programs outside the United States accredited by AACSB International in 2012–2013, as reported by CHEA.[17] AACSB has board members from Switzerland, the Netherlands, Nigeria, Mexico, China, and Canada, and offices in Singapore as well as a representative in the United Kingdom.[18]

The US accreditors are not the only ones to operate across borders. At the program level, the accreditation of business programs and schools has become a global enterprise, with EQUIS, a European-based accreditor, also accrediting business schools around the world, including Babson College, Bentley University, and the Krannert School of Management at Purdue University in the United States.[19]

Unlike in Europe, where national quality assurance agencies working in other countries are seen as promoting internationalization and European harmonization,[20] accreditation by US accreditors abroad has generated controversy. Supporters, including the accreditors who are most active in this area, emphasize the positive aspects. Seeking US accreditation is a choice, enabling institutions not

only to affirm but also to improve their quality. Jerry Trapnell, former president of AACSB International, noted in an interview with the author that AASCB accreditation is not about exporting a US model. Rather, he stated that "the standards are flexible enough to accommodate differences in structure, curriculum, and language of instruction."[21] Others argue that if accreditation is to be a global competition, the United States should be in the game.[22] For US institutions, cooperating with a foreign institution that has US accreditation has advantages—joint and dual degrees and transfer of credit are simplified, and quality assurance of the partner is validated by the institution's accreditation status.

US critics perceive the act of accrediting institutions abroad as a form of neocolonialism, imposing US processes and values through a method that should be grounded in the national culture and history. Altbach sees it as "a form of intellectual hubris," creating pressures to have curriculum and academic practices conform to US standards and potentially limiting culturally relevant innovation.[23] He does, however, acknowledge the demand for US accreditation, and in a 2013 interview, Altbach noted that the practice is a "neocolonialism of the willing."[24] On the programmatic level, while science and technology are likely to be less culturally embedded than other disciplines, many other fields, including law, public administration, and business, are arguably steeped in their national culture and context. On a pragmatic level, monitoring quality at a geographical distance and in a non-English-speaking country (even though accreditation documents are in English) is a challenge.

Another potentially problematic aspect of accrediting institutions abroad deals with academic freedom. Academic freedom is a core value of US higher education, yet institutions in nondemocratic countries are unlikely to enjoy the same level of academic freedom as their counterparts in the United States. Accreditors must decide the extent to which the accreditation of foreign institutions accommodates differences created by the local context or whether they apply their standards in the same manner as is done for US institutions.

In brief, there are three major questions about accreditation of non-US institutions and programs—first, is it a good idea? The small number of institutions outside the United States that have gained US accreditation suggests there is no danger of a hegemonic sweep of US regional accreditors. Credible national or regional systems will continue for the foreseeable future to be the most important way for institutions to demonstrate their quality.

Cross-border programmatic accreditation is very well established in a few fields. Issues surrounding cross-border programmatic accreditation differ by disci-

pline. Few programmatic accreditors are highly active in accrediting programs in other countries. Arguably, the curriculum and learning outcomes of engineering programs are less culture-bound than those of other disciplines. Among business accreditors, there is considerable global competition. The future of cross-border accreditation is likely to reside more in the disciplines rather than at the institutional level, since programs—especially in business and STEM fields—are easier to translate globally.

As elaborated later in this chapter, an alternative to accreditation across borders is mutual recognition of accreditors, which avoids many of the issues of cultural fit of a US accreditation system with an institution or program in another national context.

The second major issue about accreditation abroad is whether the variations among the approaches of the regional accreditors is a problem. There is a practical dimension to this: how do institutions outside the United States select a US accreditor? The information outlined previously, and the fact that no single website or publication provides the comparison in one place, suggests that institutions would have to do quite a bit of digging and comparing to decide how to proceed in seeking US accreditation.

Third, although there seems to be convergence among regional accreditors toward limiting their work abroad, a policy issue is whether it is necessary or desirable for the United States to have a single, clear definition of what US accreditation means outside the US context and a single foreign policy vis-à-vis accreditation of non-US institutions. Unlike other aspects of accreditation, there are no federal regulations that specifically govern the accreditation of non-US institutions; the accreditors are free to decide whether they want to do so and to create standards that align with those that are applicable to US institutions. While the messiness of seven US regional accreditors may be manageable in the domestic context, it is reasonable to assert that a unified foreign policy among the accreditors would serve the interests of US higher education and institutions abroad. If the United States were to design an efficient and user-friendly unified system to accredit foreign institutions, it would likely not include seven different commissions and approaches.

Joint and Dual Degrees

Joint and dual degrees are a useful internationalization strategy, promoting collaborative curricular planning, student and faculty mobility, and research partnerships. A joint degree is the award of one degree from the cooperating institutions

and a dual or double degree is the award of two degrees upon completion of the program.[25] According to the American Council on Education's (ACE) 2011 survey of internationalization in the United States, 18 percent of responding institutions offered a dual degree with an international partner and 13 percent offered a joint degree. Another 16 percent were in the process of developing such programs.[26] It is noteworthy that nearly two-thirds of the US joint or dual degree programs enroll only international students, suggesting that joint and dual degree programs are chiefly a mechanism for recruiting international students.[27]

All the accreditors stipulate that the participating US institution must exercise academic and administrative oversight and demonstrate that joint or dual degrees are of the same quality as its own degrees. But they vary in the specific requirements, including how much instruction is required for a dual degree.

NEASC asks institutions to demonstrate that their "joint, dual, or concurrent degrees" follow commission policies, with learning outcomes defined by the institution and consistent with other degree programs.[28] Middle States provides definitions of "jointly conferred degrees" (a single degree conferred by two institutions) and "dual or concurrent degrees," specifying that dual degrees "require further study than either degree alone but less than if the degrees were pursued separately."[29]

Taking a different approach, SACS provides detailed guidelines for dual and joint degrees in a separate document on that topic.[30] To launch joint and dual degree programs with an institution that is not SACS-accredited, institutions must seek formal approval by notifying SACS of the proposed initiative and submit the agreement as documentation. SACS specifies that students must earn at least 25 percent of their credits through direct instruction by the accredited institution to receive an undergraduate award. At the graduate level, the proportion is one-third. Additionally, the policy specified that it is the responsibility of the institution to ensure the quality of instruction provided by the partner.

WASC-SCUC has separate policies for joint and dual degrees. In its *Joint Degrees Policy*, WASC-SCUC asks institutions to consult with the WASC-SCUC staff liaison about the new program and specifies that if the partner is not accredited by a US secretary of education–recognized accreditor, it must take steps to ensure that the partnering entity is appropriately licensed, approved, or otherwise recognized by an suitable governmental entity. A "substantial portion" of the instruction should be earned in courses offered by the WASC-SCUC-accredited institution.[31]

WASC-SCUC's *Dual Degrees Policy* stipulates that a majority of the credits earned toward the degree are from courses at the accredited institution and

taught by its own faculty. Additionally, it specifies that a dual degree cannot award two degrees for substantially the same coursework that would normally be required for one degree.[32]

These rather dissimilar policies could certainly create problems for institutions outside the United States attempting to create joint or dual degrees with US institutions from different regions. They would need to adhere not only to their own institutional and national quality assurance (QA) requirements but also to different regional policies for different cooperative degrees. This variance among regional approaches might cause the non-US institution to approach multiple joint or dual degrees with caution. As is the case with accreditation of foreign institutions, it seems that a coordinated foreign policy about joint and dual degrees would serve US higher education well in facilitating efforts at international cooperation.

Accreditation of collaborative degrees is also a challenge from the US perspective. About half the respondents in the ACE study reported accreditation as a challenge. Institutions sponsoring joint degrees were more likely to report facing challenges than those sponsoring double degrees (67 percent compared to 41 percent).[33] The US regional accreditors, especially SACS and WASC-SCUC, are clear about the responsibility of the US institution to verify and vouch for the quality of instruction of its partner. Distance, language, and different cultures and traditions can make this a complicated task. The ACE study reported that about one-third of the programs were in business, and another one-quarter in the natural and physical sciences. Many of these programs would also carry specialized accreditation, which could further complicate matters.

Dual degree programs, the more popular model in the United States, raise doubts about completion requirements for two degrees, which are certainly not twice the requirements for a single degree. Some critics assert that dual degrees are a form of "credential inflation"[34] or "two for the price of one"[35]—both in terms of cost and student degrees.

And finally, joint degrees may suffer from a recognition problem, where the legitimacy of the foreign partner (whether in the United States or abroad) may be questioned. In the case of dual degrees, each degree-granting institution can rely on its own legitimacy in its country.

International Branch Campuses

Institutions can deliver instruction abroad in a variety of forms and for different purposes; the accreditors refer to all of these undertakings as "other" or "additional" locations. Accreditors generally treat "other locations" the same, whether they are

in the United States or abroad. All accredited institutions must report their other locations (domestic and international) to their regional accreditor as a "substantive change" under federal policy. Federal regulations require that accreditors undertake site visits under certain circumstances.[36]

According to the Cross-Border Educational Research Team (C-BERT) database, there are 247 international branch campuses worldwide, exported by 33 countries and imported by 76; 21 are in the planning stage and 42 are known to have closed. The United States is the largest sponsor of branch campuses, with 77 to its credit (followed by the United Kingdom at 38).[37] The growth has been substantial; according to the Observatory for Borderless Higher Education, there were 160 international branch campuses in operation in 2009.[38] Examples of branch campuses are NYU Abu Dhabi; Texas A&M Qatar; Webster University with campuses in the Netherlands, Switzerland, United Kingdom, Austria, Thailand, Ghana, and China; and Nottingham University (UK) in Malaysia and China. More common than full-branch campuses are programs abroad, such as MBAs offered entirely in a location abroad—for example, the University of Chicago MBA in Shanghai.

It is interesting to note that one of the few joint statements of the regional accreditors issued under the aegis of the Council of Regional Accrediting Commissions—the 1997 *Policy on Principles of Good Practice in Overseas International Education Programs for Non-US Nationals*—outlines principles in the areas of institutional mission, authorization, instructional program, resources, admissions and records, control and administration, ethics and public disclosure, and contractual arrangements.[39] The statement reflects the agreement of the regional accreditors that the overseas program is rooted in the institution's mission, that institution takes full responsibility for the quality of the overseas program, applying the same standards as for the home campus, and that the sponsoring US institution does not sell or franchise the rights to its name or accreditation. All require prior approval to begin such initiatives, comparability of academic standards and practices to those of the home campus, and ongoing monitoring through the regular accreditation process of programs "wherever and however delivered."

Although regional accreditors' approaches to branch campuses follow a set of general principles, there is still room for interpretation and application of the standards. Accreditation of branch campuses also raises a host of issues that go beyond meeting the standards of the accreditor, as complicated as that may be. Accreditors will need to monitor how the home campus ensures the quality and equivalence of the educational experience of the branch campus, the extent to which academic programs and courses are or should be adapted to circumstances

in the international location, and the mechanisms for ensuring coordination with the home campus. All of this must be done with an understanding of the different cultural and regulatory context of the host country.

An additional complication arises from the fact that a branch campus must meet the requirements of its US accreditor as well as the QA and legal requirements of the host country.[40] Host governments may choose to take a more or less activist role in QA of foreign branch campuses.[41] There is always the potential for conflict between the policies of the home country accreditor and those of the host country. Dubai, for example, has established a QA system to ensure that the quality of the branch campus is comparable to that of the home campus, requiring that institutions only offer programs at the branch campus that are offered at the home campus.[42] US accreditors are not similarly restrictive.

The question of long-term sustainability of the branch campus is also relevant to accreditation, especially when there are large investments from the host country that could be withdrawn at any time. For example, what will happen if the Qataris decide to stop supporting the campuses in Education City? Demonstrating financial stability is a shared requirement of the accreditors, yet branch campuses with heavy subsidies from the host countries are highly vulnerable. If an uncertain future for continuing subsidies were to jeopardize accreditation, it would lead to the closure of a good number of branch campuses.

Academic freedom is another potential sticking point, as is the case with accreditation of foreign institutions. According to C-BERT, a healthy proportion of branch campuses are located in countries that restrict speech and/or the press: United Arab Emirates and China host 32, Singapore and Malaysia 12, and Qatar 11. Although the US institutions have generally posited academic freedom as a condition of pursuing a branch campus, its implementation in foreign contexts is not always so clear-cut. There are two issues at play.

First, no matter what the policies of the campus, the host nation has the right to grant or deny visas, thus restricting access to scholars with whom the government might disagree.[43] Whether or not such an action jeopardizes academic freedom at the university, it demonstrates that variables that the US institution cannot control may have a chilling effect.

Second, restrictions on freedom of speech in the host country can also pose a challenge for branch campuses. Singapore has restrictions on public protests, as does Malaysia.[44] Although branch campuses are largely protected from limitations on free speech in the classroom and on campus, protests against the host government may be forbidden. Moreover, administrators and faculty are cognizant that

they are there as guests of the government. Warren Fox, executive director for higher education at the Knowledge and Human Development Authority, a Dubai government agency that accredits foreign higher education institutions, asserts that foreign universities "need to be aware of the environment they're entering."[45] Accreditation policies, however, do not clearly mark the line between sensitivity to the host culture and self-censorship.

Some Possible Ways Forward

All higher education institutions working internationally face the question of how they ascertain the quality of institutions in other nations—for example, to judge the preparation of undergraduates for admission to graduate programs or the quality of a prospective partner institution.

A first step in ascertaining quality is to know whether an institution is recognized by the appropriate national authority. Within the past two decades, most countries have developed national QA agencies and mechanisms, thus making it possible to obtain information about a particular institution by consulting that agency or one of the international sources that compiles information on institutions recognized by their respective national QA or accreditation agencies. Examples of the latter include the European Network of Information Centres in the European Region and the National Academic Recognition Information Centres in the European Union (ENIC-NARIC) established under the European Commission and United Nations Educational, Scientific and Cultural Organization (UNESCO),[46] and the International Association of Universities' *World Higher Education Database*, which provides information on the educational systems of more than 180 countries and 18,000 recognized institutions around the world using information made available by the national competent bodies in each country.[47] UNESCO has a similar portal.[48]

In the United States, organizations such as the Association of Collegiate Registrars and Admissions Officers (AACRAO) and World Education Services (WES) provide general information on education systems and sponsor credential-evaluation services. The problem is knowing enough about the national QA process to declare that such recognition means that the institution in question will satisfy the standards of the inquiring institution or employer.

But as mobility and cross-border activities continue to grow, having employers, students, or institutions rely on their own research may not be the best solution to understanding the quality of an institution in another country or the credentials of foreign graduates. Fortunately, there are a number of initiatives under way

around the world that attempt to provide more robust approaches, and each has its strengths and weaknesses and differing potential for further development. One group of approaches is concerned largely with inputs and internal institutional processes for quality review. This involves either the mutual recognition of accreditation agencies or the recognition of QA agencies or accreditors by a superbody. This "process approach" underpins most of the current work in QA and accreditation worldwide.[49]

Although the interest of the US accreditors in participating in these strategies is unclear (with the exception of the Association of Engineering Education, which has led the way in mutual recognition), the models exist and they have already put down roots.

Mutual Recognition of Accrediting Bodies

Mutual recognition of accrediting bodies is "an affirmation by each [agency] that it accepts the decisions and judgements of the other."[50] Mutual recognition of credentials, though not synonymous with mutual recognition of accrediting bodies, requires that the quality of the degrees be deemed comparable, and therefore that the standards of the accrediting bodies must also be comparable. Thus, mutual recognition of accrediting bodies can be considered a precondition of mutual recognition of credentials. A model of mutual recognition already exists on a programmatic level with the Washington Accord, established in 1989 for engineering degrees.[51] Similar and more recent agreements are the Sydney Accord for engineering technology education, the Dublin Accord for engineering technician education, and the Seoul Accord for computing education. The mutual recognition approach is particularly well suited to science and technology as well as the professions, where curricula are likely to be similar and licensure tests assess learning outcomes.

Although mutual recognition builds on networking, it is a much more ambitious and complicated undertaking. An important foundation for mutual recognition is a process of networking and familiarization with the work of other agencies. A great deal of activity already exists in this arena. A number of regional networks exist, such as the Asia Pacific Quality Network (APQN), the Africa Quality Assurance Network (AfriQAN), the Arab Network for Quality Assurance in Higher Education (ANQAHE), the European Association for Quality Assurance in Higher Education (ENQA), and the Ibero-American Network for Accreditation of Higher Education Quality (RAICES). On the global level, the International Network for Quality Assurance Agencies in Higher Education

(INQAAHE) has some 280 member agencies and has developed guidelines of good practice that aim to help members improve their work. Member agencies can apply to INQAAHE for recognition of their adherence to the guidelines.[52] CHEA convenes the International Quality Group to exchange information; it also has developed a statement of quality principles.[53] All of these networks help foster mutual learning, develop codes of good practice, and increase the transparency of QA processes. Building trust is an essential outcome of the work of these networks and a prerequisite to mutual recognition.

Europe is the most engaged of all regions in promoting mutual recognition of credentials, and, indeed, the European higher education ministers committed at the 2012 Bologna follow-up meeting in Bucharest to the long-term goal of automatic recognition of credentials across European borders.[54] A number of European initiatives have been implemented to promote mutual recognition of credentials.[55] The foundation is the Lisbon Recognition Convention (LRC), noted earlier, which is the legally binding treaty of the European Higher Education Area (EHEA) and provides a "common and legally agreed legal basis for recognition in the region."[56] The LRC sets out principles that assert students' rights to a fair assessment of their credentials, that their credentials will be recognized if no substantial differences can be proven, and the right of appeal, among others. Different countries have specified different principles in their national legislation. Decisions about credentials are generally but not always made at the institutional level, usually taking into account advice from the ENIC/NARIC information centers. In 2013, a manual for credential evaluators to apply the LRC principles was developed. Although the United States is a signatory and the US Department of Education (ED) does maintain an ENIC information center, the treaty was not ratified by the United States. US institutions act autonomously in their evaluation of foreign credentials, although they often seek information and advice from various sources.

The future of mutual recognition of credentials or specifically QA agencies may lie at the regional or subregional level, as the European experience suggests. Regional initiatives may make it easier to build trust over time and be reinforced by other forms of regional cooperation, such as trade integration and mobility of the labor force. But regional integration of education has had little appeal to date on the North American level. There has been no drive for harmonization among Canada, Mexico, and the United States comparable to Europe's Bologna Process. Some Mexican and Canadian institutions have sought US accreditation, though this is unlikely to develop into a wholesale solution. Nor is it likely that the US accreditors will seek agreements with selected QA agencies or accreditors outside

the United States. It seems as long as the United States continues to be a magnet for graduate students, and the processes in place for evaluating foreign undergraduate credentials is manageable, there is little motivation for the US regional accreditors to seek mutual recognition with foreign QA agencies or accreditors.

Mutual recognition of programmatic accreditation, as illustrated by the Washington Accord, may be easier to achieve than mutual recognition of institutional accreditors, especially in fields where the learning outcomes are clear-cut.

Recognition of QA Agencies: The Meta-Approach

A second approach to fostering greater transparency and clarity about QA agencies and the institutions they review is for a superbody to recognize QA agencies and accreditors as conforming to a given set of standards. In the United States, recognition of accrediting agencies on a national level is a familiar approach. Agencies must be recognized by ED to ensure that the institutions they accredit are eligible to receive federal funds; agencies can also choose to be recognized by CHEA. However, recognition by CHEA or ED does not require that the accreditors recognize each other. The concept of recognizing accreditation/QA agencies has also been applied in Europe to create a European Quality Assurance Register (EQAR). EQAR has facilitated recognition by governments or other agencies of its recognized agencies and their results and decisions, and has also opened the possibility of institutions choosing a QA process conducted by a different national agency from their own. The APQN established a similar registry in 2012 and conducted its first review of the Fiji Higher Education Commission in 2015.

A variation on the registry model is a global rather than regional registry. This idea, known as the Worldwide Quality Register, was floated about 15 years ago and garnered very mixed reactions.[57] Perhaps with the creation and successful implementation of EQAR as a multinational model and the proliferation of regional and global networks of QA agencies, the notion of a global registry might be less objectionable in the future. Each QA agency or accreditor could make an independent decision about applying to be part of the register, thus addressing the question of the autonomy of the agencies. However, the obstacles have not disappeared, despite the greater trust and transparency among QA agencies that now exists due to numerous regional and global networks.

A more complicated and difficult model would be mutual recognition of superbodies, that is, agreements between organizations such as CHEA and EQAR that their standards for recognition are substantially equivalent, thus opening the door for voluntary mutual recognition by their respective member agencies.

Given the wish of US accreditors to preserve their autonomy, such a scenario seems unlikely, at least in the near future. Any such negotiation would involve all seven US regional accreditors, and it is difficult to imagine that they would see the benefit to US higher education institutions as sufficiently compelling to undergo such an exercise.

Conclusion

The potential interest of US accreditors in either a regional or global meta-accreditor or mutual recognition of QA/accreditation agencies working at the institutional level would seem to be slim at the moment. The global reach and reputation of US higher education (or at least its most visible institutions) have not required US accreditors to contemplate whether such worldwide approaches would bring any advantage to US students and institutions. One could imagine a time when such steps might become useful, but as long as the flow of international graduate students remains strong and US accreditation continues to be recognized as trustworthy, there will be little motivation for US regional accreditors to become part of a regional or global system of any sort. Mutual recognition at the program level, especially in professional and scientific fields, is a more likely route for the United States.

But the world of cross-border education continues to change rapidly. The growth of worldwide hubs for international students may continue to reduce the US share of mobile students, as might the growing attractiveness of other national destinations. Branch campuses of foreign institutions may open in the United States. The United States might alter its model of joint and dual degrees, moving from a mechanism that is primarily a means to recruit international students to one that enhances program scope and internationalization. Pressures could mount from other countries to deal with a more unified set of US policies for cross-border higher education. The United States is not assured that its accreditation system will be highly regarded around the world. American exceptionalism seems to still be in force when it comes to accreditation, but it may not work forever.

NOTES

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PART IV / Perspectives of Consumers

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The Employer Quest for the Quality College Graduate Recruit

Edwin W. Koc

Approaching accreditation from the perspective of its "consumers," this chapter offers the perspectives of employers, focusing on what is sought in higher education graduates, how quality is assessed from this point of view, and what institutions and their accreditors might do to improve the link between what employers seek and what institutions provide.

> More than half of America's recent college graduates are either unemployed or working in a job that doesn't require a bachelor's degree.
>
> —Jordan Weissmann, 2012

> More than half of [employers say] they have trouble finding qualified people for job openings.
>
> —Amy Scott, 2013

These two quotes sum up the core paradox of the college labor market today. While in one sense the market seems flooded with the number of college graduates available to employers (the percentage of the labor force with a bachelor's degree is greater than at any time in history), a significant number of employers complain that they cannot find candidates to fill entry-level positions with the requisite skills necessary for a successful employee. These employers complain

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that the candidates they encounter as new college graduates have not received the "training" the employer expects to see in a graduate and blame higher education for not providing these basics.

The seriousness of the situation is probably somewhat exaggerated by the media attention it has received in recent years. Data from the US Bureau of Labor Statistics and the Federal Reserve Bank of New York suggest that the level of joblessness and underemployment of new college graduates today is likely little different than it was during the 1990s when the United States saw a peak labor market.[1] Employers, despite their expressed concerns about the quality of new college graduates, have encountered a very advantageous labor market over the past several decades, which is demonstrated in this chapter. However, the situation cannot be dismissed simply because it has been exaggerated. The employment prospects for graduates may not be significantly different than they were 20 years ago, but the need for a better return on students' educational investment has certainly changed. The price of a college education escalated dramatically over the past twenty years, while the income, in real dollars, for the average college graduate stayed relatively flat (fig. 12.1).[2]

Employers for their part make a tremendous financial investment in hiring new college graduates for their companies. Based on data from the National Association of Colleges and Employers (NACE) First-Destination's report for the

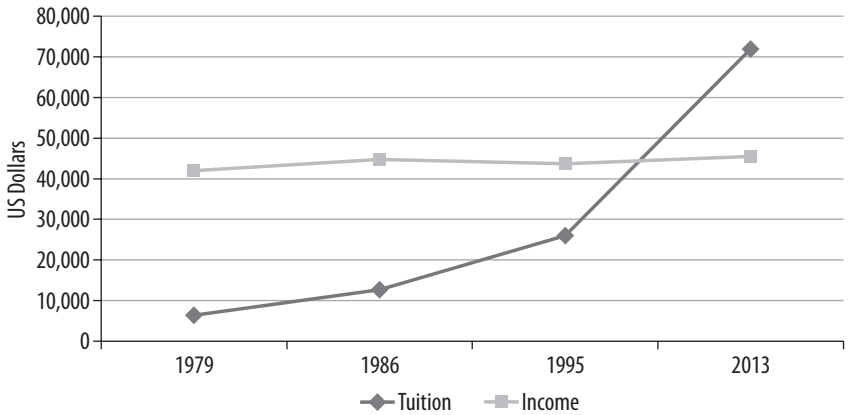

Figure 12.1. Four-Year Average Tuition versus Annual Income. Source: Annual income numbers are from Pew Research, while average tuition in real dollars is calculated by the author from tuition data reported by the College Board and the Consumer Price Indices for education published by the Bureau of Labor Statistics.

class of 2015, the estimated outlay in base salary and benefits for American employers for new college bachelor degree graduates hired in 2015 approached $63 billion.[3] In addition, an estimated $9 billion was spent on recruiting elements just to bring these new graduates on board.[4] This is an extraordinary outlay for which employers expect a strong return on their investments. Consequently, marked attention is paid to identifying the best possible candidates for each position with a deep concern over the extent to which each candidate is ready to enter into their careers. American employers are increasingly looking to institutions of higher learning to develop the skills, attributes, and knowledge that will make these entry-level employees job and career ready. Employers, as one of the core consumers of the products of higher education, want to be assured that these "products" meet adequate standards for job/career readiness.

A Buyer's Market

Recent history generally has been kind to American employers as far as the labor market for new college graduate goes. For most of the past forty years, employers have enjoyed what could be termed as a *buyer's market* when it came to recruiting entry-level professionals from among new graduate recruits. This is evident both in terms of the growth in the supply of new graduate candidates for that market and the wage rate that the average employer has had to pay for the average new recruit.

From 1971 until 2014, the size of the graduating group from America's four-year public and private and for-profit institutions grew by nearly 123 percent, from 840,000 in 1971 to 1,870,000 in 2014.[5] While the number of jobs grew during this period as well, that growth was not as great in jobs that are traditionally classed as requiring a college degree, at least if one can judge by the change in starting salaries in real dollars. Economists estimate the demand for a skill or job attribute by the change in the wage rate for the job or attribute. The assumption is the demand for the attribute has increased if the wage offered for the attribute has increased. For example, if the average wage rate for a graduate with a computer science degree increases by 10 percent, that implies the demand for those graduates is exceeding the supply, forcing employers to offer a higher wage.

NACE has been collecting starting salary data for graduates entering full-time employment after receiving a bachelor's degree since 1960. Tracking the average starting salary as expressed in constant dollars from 1971 until 2015 gives a good sense of how demand for new graduates entering professional careers has compared with the supply. Figure 12.2 shows that the demand/supply ratio has

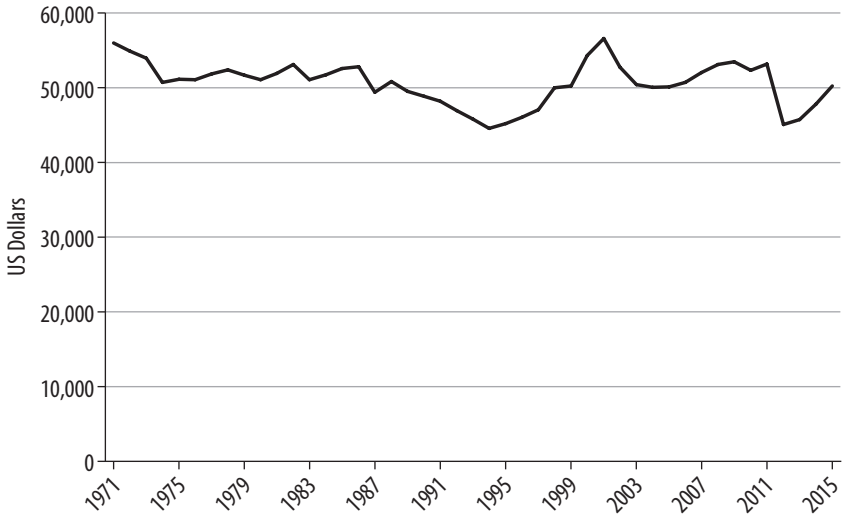

Figure 12.2. Starting Salaries for Full-Time Employed Bachelor Degree Graduates. Source: From data provided in Andrea Koncz, "Salary Trends through Salary Survey: A Historical Perspective on Starting Salaries for New College Graduates," *NACE Journal* (2016): 21.

remained fairly constant since 1971.[6] There have been periods where the supply has significantly exceeded demand, as during the recessions of the early 1990s and 2009–2010, and periods during the late 1990s and early 2000s where a robust American economy generated demand that exceeded supply, but in general the line has declined over the long haul. In fact, the new graduate starting salary at the end of the period is approximately 10 percent less than at the start (in constant dollars).

The general buyer's market facing college graduates is likely to continue. In fact, it is likely to be exacerbated throughout the rest of the decade. Comparing data on enrollment and completions with the projections made by the Bureau of Labor Statistics (BLS) on the number of job openings from economic growth and replacements due to retirement in occupations requiring a bachelor's degree, as defined by the bureau, produces a somewhat distressing picture for new college graduates. Based on the most recent enrollment trends, there will be 16.3 million bachelor degrees awarded between 2014 and 2022. Assuming that 80 percent will be active in the labor market (current level), there will be 13.1 million new bachelor degree entrants into the job market. Current BLS projections estimate

only 8.6 million job openings in occupations requiring a bachelor's degree during this same period.[7]

This does not mean that students graduating over the next several years will be unemployed. Employers have to a great extent redefined the occupations that require a degree beyond those identified by the BLS. For example, a few years ago Ellen Kullman, then the CEO of the DuPont Corporation, commented on what the corporation was seeking in new hires for its line operators at its plant in Spruance, Virginia. She stated, "You need more than a high school degree, either a community-college or a vocational-college degree. . . . They have to be able to communicate with engineers. They have to be able to bring thinking into their job."[8] The surplus in college graduates and the transformation in the technologies associated with production have allowed employers to redefine jobs that were once manned by individuals who did not even have a high school diploma as now requiring the completion of a postsecondary education.

Even with the projected oversupply of college graduates, employers will still need to deal with a number of issues involving the recruitment of graduates. There are frictions in any labor market that generate pockets of supply shortages. Location and shortages of particular technical skills are two such frictions. For example, while the number of college graduates may be perfectly adequate to meet demand in the nation as a whole, there can be areas where the demand is concentrated but the supply is relatively scattered. Consider Silicon Valley / Northern California, with its intense concentration of firms engaged in software development and the need to attract graduates with computer science skills from universities across the country. These employers are forced to pay a premium in the wage rate for these recruits. They will be especially concerned with the capabilities of the recruits they are bringing on board.

American business has been perceived as critical of the job colleges are doing in preparing students for entry into the workforce for some time. Back in 2006, a consortium headed by the Conference Board issued a report that was interpreted as suggesting that graduates were deficient in the most important skills necessary to be valuable contributors to the workforce. A closer reading of the report would see that interpretation as somewhat exaggerated. The most critical findings in terms of being inadequately prepared for the workforce were reserved for high school graduates. College graduates, particularly those from four-year institutions, were generally rated as being adequately prepared, at least in terms of their general knowledge, which can be assumed to constitute the substantive information and technical skill associated with a particular job function. Only 8.7 percent of

respondents rated graduates from four-year colleges as being deficient in general knowledge. However, there were noticeable deficiencies identified in terms of applied skills.[9] Applied skills are more basic attributes connected with the workplace and not connected with any particular position. They are the skills an employer expects any graduate to possess, whether that graduate is expecting to be employed as an engineer, an accountant, a software developer, or an entry-level backroom office employee.

The Conference Board survey from 2006 is just one such indication; others have since followed. Research conducted by the Career Advisory Board in 2011 reported that only 14 percent of hiring managers felt that college graduates had the requisite skills to fill open positions with their firms.[10] A more recent report from the *Chronicle of Higher Education* finds that the issue of job preparedness among college graduates continues after the recession. A survey conducted by the *Chronicle* and the Huron Consulting Group in 2016 involving 125 hiring managers found that employers are having difficulty finding qualified job candidates among recent college graduates.[11]

However, one needs to be careful in assuming that college graduates are generally unprepared for the workforce. NACE has asked its employer members repeatedly over the years to grade their recruits on a series of job-related skills. The grades have been consistently stronger than one would expect given the general impression created in the media. Virtually all the grades for specific skills are B or above.[12] Even those critical studies from the Career Advisory Board and the *Chronicle* are more sanguine about the job college does in preparing students for the workforce than the initial data would indicate. For example, in the 2016 study by the *Chronicle of Higher Education* the same employer representatives who said they had difficulty finding qualified recruits for their positions were generally positive about the job that colleges do in preparing students for the student's career success. Nearly three-quarters (73 percent) rated higher education as doing a reasonably good job in preparing students for career success.[13]

What Attributes/Skills Do Employers Rank as Being the Most Important?

The 2006 report from the Conference Board identified what they termed as applied skills as the most important for a new college recruit. There were eleven such skills/attributes identified in the report. In order of those most frequently cited by the Conference Board's respondents as very important, they are:

1. oral communications skills,
2. teamwork,
3. work ethic / professionalism,
4. written communications,
5. critical thinking / problem solving,
6. ethics,
7. leadership,
8. creativity,
9. applied information technology skills,
10. self-direction, and the
11. ability to work in a diverse environment.[14]

All of these were identified by more than 70 percent of respondents as very important skills for a graduate to have upon entering the workforce.

NACE has tracked the skills and qualities that employers have identified as important for a number of years and in a number of ways. Our Job Outlook surveys have asked the question in a variety of ways. We have asked respondents to rate what skills they feel are important, we have forced them to rank each skill against all the others, and we have asked which skills they have found lacking in their new hires. The result has been some change in the rank ordering of the skills that employers deem to be important. Some of this may be attributable to the changes in the question wording; some may be due to changes taking hold in the workplace at the time of the survey. However, the more significant finding is that there is general agreement among employers on the most valuable skills a college graduate can possess for entry into the workplace and that these skills have led the way for a number of years.

These are essentially the same applied skills identified by the respondents to the Conference Board survey. When NACE asked their employer members to rank the most important skills for a new graduate recruit to possess upon entering the workforce in 2011, at the height of the labor market recession, the following were cited by at least two-thirds of the respondents:

1. verbal communication skills,
2. strong work ethic,
3. teamwork,
4. analytical skills,
5. initiative,

6. problem-solving skills, and
7. written communication skills.[15]

Where Do Employers Find New Graduates to Be Deficient?

The *Marketplace* survey of employers from 2013 summed up the critical shortcomings employers see in new graduates effectively. "Recent grads too often don't know how to communicate effectively. And they have trouble adapting, problem solving and making decisions—things employers say they should have learned in college."[16]

Data from surveys such as those issued by the Conference Board and NACE essentially found the same deficiencies. Of the eleven applied skills that employers in the Conference Board survey marked as very important, there were six where the percentage of employers that graded new graduates as adequate in that skill was less than the percentage of employers that saw the skill as essential. In rank order based on the gap between the percentage of employers that saw the skill as essential and the percentage who rated graduates as adequate in that skill, they were:

1. written communication skills,
2. work ethic / professionalism,
3. leadership,
4. oral communication skills,
5. teamwork, and
6. oral communications skills.[17]

NACE in its latest *Job Outlook* report asked its employer members to rate career-readiness competencies both in terms of importance to success and current college graduates on their performance in these competencies. Both ratings were on a five-point scale where 1 equaled no importance or the graduates' completely lacking in the competency and 5 equaled extremely important or extremely competent. Figure 12.3 shows the difference between the employers' perception of importance and their perception of how well graduates from the class of 2016 performed on the individual competency.[18]

It is clear from the figure that there are three competencies where employers rank college candidates as particularly deficient—critical thinking, professionalism, and communications. Interestingly, the one general competency that can be tied to a "hard" skill, proficiency in information technology applications, is the competency where the performance of candidates generally exceeds the employer's stated need.

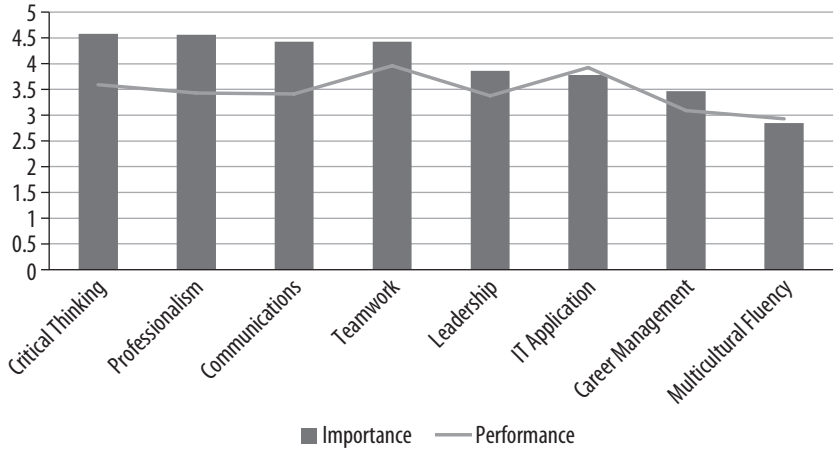

Figure 12.3. Career Readiness Competencies: Importance versus Proficiency. Source: National Association of Colleges and Employers, *Job Outlook 2017* (Bethlehem, PA: National Association of Colleges and Employers, 2016), 25. The chart is based on information in the cited report.

Identifying the Quality Candidate: The Employer Process

Although employers will consistently cite applied skills/competencies such as the ability to communicate or critical thinking as the most important capacities a new graduate can have upon entering the workforce, the selection process American employers use in talent acquisition belies those survey responses. The primary criterion in the recruiting process is the technical/substantive knowledge the student may possess based on the academic program the student majored in on his or her way to the degree. This is clear from what employers say about how they focus their recruiting on selected schools and which majors are most likely to be employed soon after receiving the degree.

There are more than 3,000 universities and colleges producing graduates with bachelors' degrees in the United States. Consequently, the first step in the process for any employer/recruiter is to select the schools from which potential recruits will be examined. How is a school chosen to be a recruiting target? As table 12.1 shows, the number one criterion for choosing a school as a target institution is the academic majors offered at the school.

"Majors offered" provides the employer with a quick way of narrowing the field of possible recruits. For example, engineering majors have been a focus of college recruiting for a number of years. The number of four-year, degree-granting

Table 12.1. Employers' Top Reason for Selecting a Target School[1] (in percentages)

Majors offered	23.2
Quality of programs	19.6
Past recruiting experience at school	16.5
Location of school	12.4
Success of school's alumni in your organization	5.7
National rankings	4.6
Reputation of school	4.1
Diversity of student body	3.6
Accreditation of school	3.1
Interest of school's graduates in your organization	2.6
Executives are alumni of school	2.6
Retention history with school's alumni	1.5

1. National Association of Colleges and Employers, 2012 Recruiting Benchmarks Report (Bethlehem, PA: National Association of Colleges and Employers, 2012)

institutions in the United States that offer engineering programs is approximately 500. The employers who are seeking the specific technical/substantive knowledge connected with an engineering degree will quickly narrow the universe of schools open for recruiting to those institutions that produce these majors. Very likely, these same employers will also be looking for other majors—business, computer science, liberal arts. While these other majors will be available at a greater number of schools, it will be more efficient for an employer to limit the recruiting to schools that can provide the full array of academic majors that needs to be recruited. Right away, this limits the universe of graduating seniors who are recruiting candidates and limits the opportunity for institutions to demonstrate the quality of the education that their graduates have obtained.

Further evidence of the employer's focus on specific substantive skills in the hiring process can be found by examining the outcomes of recent graduates. For the past couple years, NACE has gathered extensive outcomes data from its member schools covering the first six months after the close of the academic year. This information identifies the percentage of graduates employed full time by academic major. Career-oriented disciplines such as engineering and business do considerably better than graduates from the liberal arts and sciences, such as English or biology majors. In fact, what the first-destination data show is that the more narrowly defined the academic program the more likely the graduate will be employed quickly after graduation. For the class of 2014, a graduate in fire protection was more likely to be quickly employed than was a graduate with a history major.[19]

This focus may pose part of the problem in the employer's search for the "qualified" hire. The applied skills/competencies valued by the employer and expected to be present in the college graduate are designed to be part of the traditional structure of a liberal education, for example, a curriculum that exposes the student to a broader array of substantive issues and multiple ways of examining problems. As Arum and Roksa suggested in *Academically Adrift*, students in the liberal arts and sciences are more likely to be educated in the critical thinking skills that employers want in a new hire than students majoring in the more career-oriented disciplines, such as business.[20] The result of beginning the selection process for a new college graduate hire with the student's academic major, particularly for general professional/administrative positions in businesses, is that it extends and complicates the process. The more direct approach would be to focus first on finding candidates that meet requirements around core applied skills, regardless of academic major.

The next step that potential candidates must traverse is their grade point average (GPA). The 2017 Job Outlook survey found that 70 percent of respondents screen potential recruits by their GPA.[21] This is down somewhat from its peak of 78 percent recorded for 2013, but it remains a central aspect of the recruiting process after the initial selection by major. The average cutoff used by these employers is a GPA of 3.0 on the 4.0 scale.

The GPA is an awkward measuring stick because it does not differentiate students very well. Without knowing grading trends at a particular university, or better still a particular department or program, it is at best a broad indicator of the substantive knowledge a student may possess and the commitment to work that he or she has. By requiring a GPA of at least a B, employers are hoping to assure themselves that the candidate has at least an adequate dedication to his or her professional responsibilities. The problem is that overall data on student grades at the school or in a particular program is ordinarily not available. So, the employer is left guessing whether the B at one school is the equivalent of the B a student posts at another school.

Once the weeding process has come to this point, employers get to analyzing the candidate skills they say are the most important to them. It is at this point that the recruiter generally feels that he or she must leave the context of the college/university system to make an evaluation of candidate qualities and skills. Institutions of higher education constitute a necessary first step in the employer's search because that is the universe from which the employer wants to draw future employees. However, institutional evaluations are not sufficient qualifiers for the

candidate because they do not adequately address the core applied skills an employer seeks in a candidate.

Since what the employer is seeking is an assessment of how the student will perform in the working environment represented by the employer's firm, the alternative to the college transcript has rapidly become the internship. In the NACE *Job Outlook* survey for 2017, nearly 91 percent of respondents reported that they look for candidates with relevant work experience for their entry-level positions, with a clear majority of those firms preferring that the experience come through an internship or cooperative education program.[22] The primary focus of an employer's internship program has become the active recruiting of potential employees rather than simply providing some work experience to college students. This can be seen in how dramatically the conversion rate (the percentage of interns that become full-time employees at the internship firm) has changed over the past decade. In 2005, the conversion rate for interns was 35.6 percent, and by 2016 that rate had nearly doubled, to 61.9 percent.[23]

While internships have been around for a long time, the focus of the internship has changed since the turn of the century. The internship is not the apprenticeship envisaged by the rules set forth by the Department of Labor under the Fair Labor Standards Act.[24] It is not designed to teach the student the substantive skills of the job; rather, it is now the vehicle through which the employer can evaluate the degree to which the student possesses those critical applied skills (the ability to communicate, the capacity to think critically, and most especially the desire to behave professionally) necessary for a good employee.

The important point to note here is that employers have increasingly felt it is necessary to go outside of the higher education system to produce adequate evaluations of their potential college hires. The problem here is that many students do not get the opportunity to participate in an experiential education program. Among the bachelor degree graduates from the class of 2016, approximately 62 percent had some form of experiential education during their time on campus. That leaves nearly 40 percent of graduates without the chance to adequately identify their skills/competencies to potential employers. In addition, the internship itself is a limited evaluative tool for employers who did not actually employ the intern, which will be most employers since only about 25 percent of graduating interns get job offers directly from the firm that employs them as interns.

The lack of a clear connection between the degree and career skills/competencies and the limitations of relying on the work experiences in the student's résumé have given rise to several alternative methods of capturing more fully the work

qualities of new graduate recruits. Three such alternatives are examined here: digital badging, external testing, and competency-based education programs.

Digital badging is an electronic credentialing system designed to provide individual students with a method of communicating recognized skills, accomplishments, and experiences to potential employers. The idea is to provide the potential employer with a fuller, more nuanced view of the potential graduate recruit. The student receives the badge by attending certain classes or completing a project or taking and passing an exam. The badge can be issued by a host of different providers—the university the student attends, another college or university, a testing company, a community organization, even an individual. An example would be the badges being offered by edX in conjunction with their massive open online courses (MOOCs) developed by Harvard and MIT. edX will provide the student who completes the course with a digital badge indicating that the course was taken and completed for a fee.

The badge itself is an electronic certificate containing details about the student, what the particular badge itself represents, and how the badge was earned. In some cases, the badge has an expiration date similar to the certificate one gets when one completes CPR training. The badge exists outside of the student's degree transcript and needs to be in a format that can be read by the employer's software system to make it useful.

To date, the use of digital badging has been very limited. In concept, employers might find them useful in providing more detailed evidence of a potential recruit's applied skills/competencies. A majority of employer talent acquisition managers surveyed by the *Chronicle of Higher Education* saw decided advantages to digital badges. For example, 55 percent of these respondents agreed to the statement that the digital badges would "give us more confidence that the student truly has the knowledge and the skills needed to do the job well."[25] However, this positive position on digital badges is muted to a great degree by the fact that only 42 percent of the same respondents indicated that they were familiar with digital badges.[26]

There are several problems with digital badging becoming more widely used. First, the badges do not necessarily represent the skills and competencies that are the core interests of the employers. Many are for extracurricular activities that an employer is likely to find hard to evaluate in terms of contributing to a job skill. Second, there is currently no standardization in terms of evaluating the quality of the participation that is incorporated in the badge. Since badges can come from any number of sources, just what a badge represents is difficult to judge. This

problem might be overcome if the badges came from the college or university, with the prestige of the school being tied to the badge. However, currently very few schools have adopted badging, and the question would be how the badge is different than the transcript if it comes from the university.

A second alternative for assessing the applied skills/competencies that has been suggested is external testing of college graduate candidates. The survey conducted on behalf of the *Chronicle of Higher Education* found that more than 60 percent of their employer respondents currently did preemployment testing to evaluate a candidate's general skills and fit for the organization.[27] NACE has asked its employer members about the use of preemployment tests for several years and has found a much lower rate of usage for these tests—only about one-quarter of NACE employer members use preemployment tests in their recruiting process.[28] Regardless, there has been a growth of interest in the possibility of establishing deeper and better credentials for college graduates through standardized tests conducted at or near graduation.

An example of such testing that received considerable media attention recently is the Collegiate Learning Assessment (CLA+). Developed by the Council for Aid to Education, the CLA+ is designed to measure a student's proficiency in critical thinking / problem solving, effective writing, logical reasoning, quantitative reasoning, and critical reading. The test gained a good deal of notoriety when the *Wall Street Journal* and the Today Show identified the test as a new way for employers to find the best graduates. The argument for the CLA+ to become a central component of the new graduate hiring process was simple and straightforward. If the test was a true measure of proficiency in the core competencies that employers find essential in a new employee, then the test could be the key indicator providing employers direction for which candidates should be given serious consideration in the hiring process, regardless of school or academic major.

The problem is getting employers to agree that the test truly measures the competencies that it purports to measure in a given setting. That is, given the diversity of employers, job tasks, and work environments, the CLA+ cannot possibly assure "on-the-job" excellence. As with most attempts to use standardized testing as a vetting tool, employers are left to figure out how it predicts performance in their particular context.[29]

Employers, while they essentially agree on the skills that are important for a new employee in concept, frequently disagree on what that skill looks like in the workplace environment. A good example involves the written communications

skill. In concept, this competency is always cited as one of the most important skills a new graduate employee should have. However, in 2011 NACE decided to get a more refined idea of what written communications as a skill really meant to employers. The employer respondents were asked to rate the "ability to create or edit written reports" in importance against a list of other skills/competencies. Rather than finding this refined version of written communications at the top of the list of preferred skills, the ability to create or edit written communications fell to the bottom of the list.[30]

This is the problem not only with extended standardized testing but also with ideas such as competency-based education. Competency-based education is generally identified as an educational system/program designed to advance students (provide the degree) based on the student's demonstrated capacity to master a skill/competency rather than providing the degree based on the completion of a set of defined courses. The advantage is that the student can develop the mastery either on the job or by completing coursework, providing for greater flexibility and potentially reducing the price of obtaining a degree for a great many students. In addition, competency-based education can be structured to provide a program to directly meet the skill needs of an employer(s). However, what works for one employer may not work for another. It has been difficult for the proponents of competency-based education to adequately define the general applied skills/competencies both colleges and employers identify as necessary in a career-ready graduate in concrete observable terms.

Employers have a tremendous investment in the graduates from America's colleges and universities. As a result, they have a particular interest in assuring that students leave the university with the requisite skills needed to succeed and to be effective in the workplace. Since the turn of the century, employers have repeatedly expressed their concern that many graduates lack the necessary skills/competencies to allow them to be immediate contributors to their companies. To a large extent, employers have lost a measure of faith in the basic rubrics the university provides—the degree and the transcript associated with the degree—to guarantee that the student has the skills and competencies employers expect to see when they hire a graduate. Although employers start with the institution as a first step in screening, the college or university qualification is hardly sufficient. Colleges are not trusted to add to the core skill development (professionalism, communications, critical thinking) that an employer seeks in a candidate. Indeed, many college programs ignore development in core competencies because these competencies are not seen as essential to a college-level educational mission. Consequently, new

vehicles outside the university system have been sought in order to provide the evaluative information employers require.

In part, the problem related to graduate skills/competencies may lie with the recruiting process used by American employers. The general focus to first rely on specific "technical" skills linked to a detailed and narrow academic program undermines the traditional liberal education focus on developing fundamental knowledges and skills that prepare the student to analyze, learn, and adapt in whatever context the graduate finds. The recruiting approach used by American employers is not sacrosanct. An alternative approach far less focused on acquisition of specific skill sets in college is used by employers in Britain. In Britain, 82 percent of employers do not stipulate a major during their recruiting of a university graduate.[31] There the focus is on general talent, which employers define as competency-based strengths related to potential effectiveness in the workplace.

This does not mean that British employers have found the sweet spot in graduate recruiting. The focus there has led to a selection process very much focused on elite institutions—something not likely to work well in the American context. However, it may be valuable for American employers to move beyond the initial focus on specific technical skills toward vetting candidates with broader, more fundamental competencies. At the same time, it is imperative for America's colleges and universities to ensure that core career-readiness competencies are incorporated as fundamental components in any and every curricular program that leads to a degree.

Recommendations

Colleges and universities would be well advised to include elements of career development into their programs and into their quality assurance efforts. The argument is often heard that it is not the job of colleges to train their graduates for jobs. However, this is specious; colleges and universities have always had a linkage to careers. The very first universities (Bologna, the Sorbonne, Oxford, and Cambridge) had as their core mission the training of graduates for the professions of law, medicine, and the ministry. It was not simply education for education's sake. To meet the mission of adequately preparing students in terms of career development, the status of career as an objective must be raised within the institutional structure of the university, and the competencies identified as essential to an individual becoming career ready must be incorporated into the university's educational program so as to be able to assess, even measure, a graduate's proficiency with respect to these core career-readiness competencies.

Virtually all American colleges and universities have career services offices whose mission is to assist students with the development of their career goals and initial forays into the labor market. However, many students have only a tangential connection with this office until their senior year, if at all. One reason is that the career services office is not directly associated with the student's core interest—the student's academic progress. Surveys of career services offices show that only 25 percent are institutionally situated within academic affairs, with about the same percentage participating in the student's academic advising process.[32] This institutional arrangement minimizes the influence the career services office (the part of the university most in touch with the college labor market and employer requirements) has in influencing the educational program, and in helping the student direct his or her academic program toward a career goal. Repositioning career services/development within the university's institutional structure to give the office a more direct role in academics can foster a greater connectedness with the university's responsibility to prepare the graduate to be career ready as part of the student's academic development.

The next step is to clearly and operationally incorporate career-readiness competencies within the educational program. NACE has developed a set of eight competencies that every graduate will need in order to be successful in the labor market of the twenty-first century. These are the applied skills that surveys of America's employers conducted by NACE and others have repeatedly found as critical to an employee's success, and which were previously listed in figure 12.3. They are: critical thinking, professionalism, oral and written communications abilities, teamwork, leadership, relevant IT skills, multicultural fluency, and career management ability.

While these competencies have wide agreement, they are currently stated in broad conceptual terms without clear reference to items that are directly observable or measurable. This limits their applicability as tools that can be used by employers to evaluate competing candidates, by the graduates in promoting themselves as potential employees, or by institutions of higher education in assessing the performance of their graduates and the performance of the institution itself.

This current limitation of the career-readiness competencies must be corrected by establishing operational definitions for each competency, where the definition will include clearly observable items that can be referenced in a candidate's résumé, transcript, vitae, and so forth, and may be subject to eventual measurement. To do so will require the development of broad consensus among college members (administration, counselors, and faculty) with the inclusion of employers and/or

their representatives as to what observables are directly associated with each competency. The goal must be to eventually develop a method for identifying and quantifying the career readiness of college graduates in order to: (1) establish a more equitable hiring process for each graduate, (2) provide employers with talent acquisition tools that will improve the efficiency and effectiveness of the hiring process, and (3) enable colleges/universities to benchmark their educational programs against the goal of preparing students for their careers.

Developing the consensus needed for the operationalization, assessment, and eventual measurement of career-readiness competencies for all college graduates will not be easy. However, it must be pursued by institutions of higher education and their accreditors if confidence in the products (the graduates) of America's college system is to be restored among the private-sector organizations that employ them and the governments that provide support for higher education to pursue its mission.

NOTES

Epigraphs: Jordan Weissmann, "53% of Recent College Grads Are Jobless or Underemployed—How?" *The Atlantic*, April 23, 2012; Amy Scott, "What Do Employers Really Want from College Grads?" *Marketplace*, March 1, 2013.

1. US Bureau of Labor Statistics, "Table 10. Employment Status of the Civilian Noninstitutional Population by Educational Attainment, Age, Sex, Race, and Hispanic or Latino and Non-Hispanic Ethnicity, Annual Average," Current Population Survey, unpublished, 1994, 1995, 1996, and 2016; Kenneth C. Tsang, "Post-Recession Employment for Young College Graduates: A Literature Review," *NACE Journal* 74, no. 3 (2014): 20 [figure 3].

2. Annual income numbers are from Pew Research, while average tuition in real dollars is calculated by the author from tuition data reported by the College Board and the Consumer Price Indices for education published by the Bureau of Labor Statistics.

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7. These figures are extrapolations from projected completions data published by the National Center for Education Statistics and the recent distribution of degrees conferred

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16. Amy Scott, "What Do Employers Really Want from College Grads?" *Marketplace*, March 1, 2013.

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18. National Association of Colleges and Employers, *Job Outlook 2017* (Bethlehem, PA: National Association of Colleges and Employers, 2016), 25. The chart is based on information in the cited report.

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Accreditation and Return on Investment

Mark Schneider and Audrey Peek

Continuing the perspective of consumers, this chapter examines how student choices about higher education could be improved by better information about outcomes, provided to students in ways more attuned to their needs and decision processes.

For many students, choosing a college is the biggest financial decision they have ever made. This choice commits them to years of forgone wages while enrolled and, in a large share of cases, years of student loan payments after they leave school. It is no wonder that students want to know beforehand whether college is worth the investment. Accreditation plays a key role in answering this question, both by requiring institutions to collect data on students' outcomes and by removing the poorest-performing institutions from the choice sets of students who rely on federal financial aid. In this chapter, we consider two ways in which information about expected return on investment (ROI) influences student choice: initiatives that provide more and better-quality information, and initiatives that structure choices and provide information at critical moments. We explore the ways in which these strategies are (or are not) integrated into the accreditation system by examining the ROI data that accreditors collect and the standards that they set for acceptable student outcomes. As we explain in this chapter, accreditors have much more to do to ensure that students leave college with good employment prospects and good chances of repaying their debt.

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Throughout this chapter, we focus on students' choices among majors and programs, because variation in outcomes is oftentimes substantial, with documented differences in first-year earnings not only between degree levels but also between institutions and programs.[1] In the accreditation process, program-level outcomes data is primarily collected by programmatic or specialized accreditors, which only oversee some programs. Ultimately, all accreditors have an interest in ensuring high-quality outcomes for students in every program. Thus, we argue that the program-level data collection and quality assurance processes used in programmatic accreditation should be extended to regional and national accreditors. Making program-level accreditation the norm will help ensure that measures of institutional quality focus on the level of measurement that matters most for transparency and accountability.

Return on Investment (ROI)

Over time, higher education policy debates have shifted from a focus on access to focus on attainment, broadening the scope of policy proposals to address access, persistence, and completion. After all, access means little if students do not complete all of the steps that lead to a credential. Even completion is of little worth if the credential does not set students up for success after leaving school. Students need access to high-quality credentials as well as support to graduate and use what they learn. In this sense, success can be defined in many ways. It can be measured by what students know and can do upon completing their credentials. For example, licensure exams or the Collegiate Learning Assessment measure student learning as a way to understand program or institutional quality.[2] Success can also be measured by students' satisfaction with their education or by their sense of well-being after they leave school or graduate. The Gallup-Purdue Index is a leader in this area, measuring college graduates' perceptions of their college experiences as well as their financial and physical health.[3]

Most commonly, success is measured by ROI, or the economic benefits associated with the investment that students, families, and governments make in postsecondary education. These benefits include higher average employment rates for college graduates, higher average salaries, and the ability to successfully repay debt. We focus on these and similar student outcomes in this chapter. Though the benefits of college clearly extend beyond financial gain, data on student learning outcomes and other measures of well-being is not yet available for all institutions nationwide. Data on economic outcomes, though far from perfect, is the best option to measure post-college ROI at this time.

Employment outcomes data has only recently been made available at the institution level through the US Department of Education's College Scorecard data, first released in fall 2015, which includes students' average incomes up to 10 years after they first enrolled. Program-level employment information is not yet available nationwide.[4] Because employment outcomes information is newer and piecemeal, our exploration of how student choice and quality assurance processes use this data aims to highlight promising practices as well as areas for improvement.

Program-Level Choice

Why focus on program-level choices and outcomes? New data shows that variation in student outcomes is substantial at the program level, even within the same institution.[5] For example, a student in accounting and a student in French literature attending the same university will likely have very different postgraduation outcomes, despite wearing the same college T-shirt and having the same insignia on their diplomas. To help students make better decisions, policymakers, researchers, and administrators must consider ways to address program-level differences in student outcomes.

Program-level choice is also critical because students' choices among postsecondary institutions can be geographically constrained.[6] Even with the best information about outcomes, many students cannot or will not relocate to attend higher-quality institutions. These geographical constraints may include jobs, family, or lack of financial resources. If a student has only one or two institutions in reasonable proximity, making the choice among programs within these institutions is even more important. A student may be able to maximize their chances of success by choosing the highest-quality program from a relatively limited set of options.

Program-level choice may be influenced by providing students with information about their likely outcomes, by structuring the decision-making process in a particular way, or by more directly controlling program quality. Programmatic, or specialized, accreditation may be used to accomplish the latter in some cases. Programmatic accreditation is linked to a program's standing within the professional community and is based in part on how well the program's faculty members and curriculum reflect professional standards. Business, engineering, nursing, and other health care programs often go through programmatic accreditation. Programmatic accreditation can be necessary to receive professional licenses, as in nursing, or to signal quality, as in business.[7] By law, some programmatic accreditors must be recognized by the US Department of Education

(ED) in order for the students in their accredited institutions to receive federal financial aid, including audiologists, nurses, occupational therapists, physical therapists, and speech language pathologists.[8] ED is only allowed to recognize certain kinds of programmatic accreditors,[9] and those who do not fall in this category may seek recognition from other organizations, such as the Council for Higher Education Accreditation (CHEA). Still other programmatic accreditors are recognized by neither ED nor CHEA but are members instead of the Association of Specialized and Professional Accreditors (ASPA), a membership organization.

According to a survey of state-level uses of accreditation, some states encourage or require programmatic accreditation for institutions that only offer courses in a specialized area. In many states, it is up to state licensing boards to determine whether an individual must graduate from an accredited program in order to receive a license.[10] In health and business, programmatic accreditation plays a critical role in signaling to students whether a program is a viable path to future employment in a particular field, including whether it can lead to the necessary credentials and credibility to be employed in that field. We see ample opportunity for these program-level accreditation practices to be extended to other fields of study by incorporating program-level outcomes measures into institution-level accreditation processes.

Because programmatic accreditors are currently the best source of information on program-level outcomes, we use these accreditors as an example in this chapter. The next two sections explore the ways in which programmatic accreditors can influence students' choices among programs. First, we explore how providing better data about expected ROI can help students make smarter decisions. Second, we investigate how setting standards and requiring accreditation for entry into some fields can guide students toward higher-quality programs. In both sections, we highlight lessons that institution-level accreditors can learn about how to measure and report program-level outcomes measures, as well as how to hold institutions accountable for student success at the program level.

Influencing Choice Using Information

At each of the stages of applying to college, from first aspiring to attend to accepting an admissions offer, students rely on information from their schools, family, and peers. Lack of such information is one of the most important obstacles to students successfully completing each of these stages.[11] When making choices about going to college or among a set of college options, economic theory indicates that students'

choices are dependent on their preferences and their taste for risk.[12] Students' rational choices are based on using the information at their disposal to fulfill their preferences. Stephen DesJardins and Robert Toutkoushian explain that students' choices may appear to be irrational for several reasons. Students may lack accurate information about their likely outcomes at a given institution, they may be incapable of properly calculating the costs and benefits of their choices, or they may be basing their decisions on unobservable factors.[13] Economists do not assume that students must have perfect information in order to make a rational choice, only that students maximize their self-interests to the best of their abilities, given the resources at their disposal.

Inequitable access to information makes it difficult for many students to fully maximize their preferences. Patricia McDonough observes that the resources in students' schools and communities shape in part their decisions about college.[14] For students in low-resourced schools, a lack of advising services and incomplete information about college options restricts decision-making. McDonough recommends that businesses and postsecondary institutions intervene to provide better information for these students. However, this means that institutions must have the capacity to gather this information and the incentives to provide it in a way that students can use. Several third-party providers have stepped in to fill this gap.

Research on interventions that provide critical information about ROI at each of the stages in the college selection process has shown that information can indeed be a useful tool for improving student choice. Providing information about these choices helps students make better decisions, especially if that information is directed toward those with low college knowledge. For example, a randomized experiment found that parents of college students were more likely to choose a college with higher graduation rates when provided with relevant information. Such information especially made a difference in the preferences of parents with low college knowledge and parents who did not attend college.[15]

In another case, the Youth Policy Institute and ideas42 developed an online tool to provide customized recommendations for high-achieving, low-income students in Los Angeles. These recommendations were based on admissions data as well as the distance between the student's home and the institution and key student outcomes measures, including graduation rates. The tool helped students make well-informed decisions among institutions that were within a reasonable distance of their homes, thereby addressing students' possible geographic constraints. Overall, this tool and others aim to expand students' knowledge about

which options are available and help them select an institution that is most likely to yield a high ROI.[16]

College Measures provides an example of ROI-focused initiatives at a larger scale. In collaboration with the US Chamber of Commerce and Gallup Inc., College Measures developed tools in Tennessee and Colorado that bring together institution- and state-level data to help students determine which programs will lead to high-paying careers that are in demand. Focusing prospective students' attention on meaningful data, such as graduation rates, future salaries, and geographic proximity, the Launch My Career tools assist students in making sense of the overwhelming amount of information they must sift through when selecting an institution and a program.[17] Launch My Career contains information about the earnings of recent graduates from particular programs, allowing students to compare graduates' program-level outcomes across several institutions. The sites also let students compare average earnings from multiple careers and calculate when their salaries will likely exceed their initial investment in a program using a break-even calculator.

This work shows how program-level information can be generated using widely available administrative data. For example, College Measures works with states[18] that have merged student-level data and unemployment insurance wage data to show employment outcomes, especially wages, up to 10 years post completion. While ED's College Scorecard reports data at the institution level, College Measures reports program-by-program measures of student success. Other measures of student outcomes at the program level will soon become available, as the growing number of campuses using the Gallup-Purdue Index of alumni outcomes eventually reports their outcome data at the program level.

Unfortunately, accreditors often fall short of meeting students' data needs. Most programs lie outside the programmatically accredited domain. For the relatively small number that fall in their purview, programmatic accreditors often do not require frequent data collection. Although many programmatic accreditors measure graduation rates, licensure pass rates, employment rates, and other outcomes intermittently, these data are generally only available on accreditors' websites. There is no easy way to find out whether a program is accredited by looking at traditional college selection tools. Data collection frequency and data accessibility are major issues that programmatic accreditors must address if they are to expand their role in consumer information efforts. These are also areas of concern for other accreditors who aim to include more program-level outcomes data. The dearth of program-level outcomes is a major barrier to assessing program quality.

In 2016, ED released key performance indicators for national, regional, and programmatic accreditors that provide greater insight into the outcomes of students in accredited institutions and programs.[19] This data highlights the large variation in outcomes. Of the 846 cosmetology entities accredited by the National Accrediting Commission for Career Arts and Sciences, 179 had cohort default rates above 20 percent, more than one in five. In contrast, just 2 out of 26 accredited by the Commission on Massage Therapy had cohort default rates above 20 percent, less than 1 in 10. This data, if easily available to the public, could help students make better choices about their field of study and help them select an alternative with good outcomes. These data might also signal which fields emphasize particular outcomes. For example, of the 46 accredited by the Association for Biblical Higher Education, just 3 had graduation rates above 80 percent, while the Transnational Association of Christian Colleges and Schools accredited 7 with graduation rates above 80 percent, out of 43 total. Neither accreditor oversees many with high cohort default rates, however. Students seeking degrees in these areas could use this information to inform their future educational paths.

While this data release makes a more specific level of data available, it only does so in the form of key performance indicators for programmatic accreditors and only in their institutional accreditation activity. Students are unlikely to find and use this information. This data is more effective in raising serious concerns about how well these accreditors ensure that all of the programs they oversee have favorable student outcomes. Students who rely on these accreditors' approval as a signal of adequate ROI, without knowledge of the variation within accredited programs, may very well be disappointed.

As more data becomes available to measure differences in program-level outcomes, program-level accreditation becomes both more feasible and more critical. One encouraging advancement on this front can be found in learning outcomes measurement. Programmatic accreditation provides valuable information about student learning outcomes, information that is often unavailable at even the institutional level. The programmatic accreditation process often requires learning outcomes assessment. As a result, accredited programs engage in more assessment activities than their nonaccredited peers, particularly in education, engineering, and nursing programs. Not only are programmatic accreditors driving more data collection, but they are also successfully creating cultures of data-driven decision-making and efficiency. Accredited programs report greater faculty engagement and greater use of assessment results than nonaccredited programs. However, both types of programs dedicate roughly the same level of resources to assessment

activities.[20] This indicates that expanding program-level data collection through accreditation could have far-ranging benefits, including overall quality improvement. Programmatic accreditors, as well as others who seek to include program-level information in their accreditation processes, should build on this momentum and make this information available to students and the public.

Influencing Choice Using Structures and Design

Simply providing more information may not always change students' choices. Decision-makers can benefit from incentives to make a particular choice. Design theory and behavioral economics both offer frameworks for determining how to structure choices that encourage positive outcomes. These frameworks indicate several ways in which program-level accreditation could guide students to higher-quality options.

Students face a multitude of challenges when interacting with policies and systems for enrolling and persisting in college. Though the vast majority of high school freshman aspire to go to college, barely half of high school graduates nationwide actually enroll.[21] In his seminal book on design thinking, Donald Norman argues that design, not human error, should be blamed when an interaction with an object or system prevents someone from achieving their goal: "If an error is possible, someone will make it. The designer must assume that all possible errors will occur and design so as to minimize the chance of the error in the first place, or its effects once it gets made. Errors should be easy to detect, they should have minimal consequences, and, if possible, their effects should be reversible."[22]

In the case of the yawning gap between college aspiration and enrollment, Norman's framework indicates that we should focus on faulty system design, not blame students for their difficulty navigating the system.

Norman offers the example of forgetting a bankcard in an ATM. While it used to be possible to retrieve money from an ATM and leave the card behind, many machines today require the user to remove their bankcard before receiving money. This is an example of a "forcing function," a design feature that constrains the user's ability to make an error. There are several different kinds of forcing functions. The ATM design is an "interlock," or a constraint that forces actions to take place in a specific order. Interlocks have been applied in higher education policy as a way to increase the likelihood that high school students will apply for college. For example, in Colorado, Illinois, Maine, Michigan, Kentucky, Idaho, and Wyoming, high school students are required to take the ACT in their junior year.[23] These policies ensure that more students complete one of the key steps in applying to college.

Another kind of forcing function is the *lockin*. A lockin is used to prevent someone from prematurely ending a process. For example, many online forms will not allow the user to submit the form without entering information in required fields. In the realm of student choice, lockins could be created to prevent students from terminating a process without completing necessary steps, such as selecting a major without also scheduling a meeting with an academic advisor. Integrated planning and advising systems, which are being implemented at campuses across the country, could also include this feature. Requiring students to meet with an advisor before declaring a major will help ensure that students have access to more of the information they need to make this decision.

Finally, forcing functions can take the form of a *lockout*, or a constraint that prevents an event or process from occurring. For example, many buildings have separate stairwells leading to the basement or a metal bar that must be moved before continuing down the last flight of stairs. These features were developed once it was discovered that panicked people fleeing a building during a fire or other emergency often continued beyond the ground floor and were trapped in the basement. By adding this lockout, people were forced to stop and consider whether they actually meant to go to the basement. Lockouts force users to consider the consequences of their actions. There are many ways in which lockout features could be used to prevent students from falling into traps as well, such as making it clear what will happen to a student's financial aid when they drop a class or making such drop decisions reversible. Lockouts, like the other forcing functions described previously, disrupt the decision-making process so that the user can consider new information or reconsider their choice. Design thinking is used to anticipate default or automatic decisions and help users avoid errors when making these decisions.

Combining design thinking principles with research in psychology and economics, Richard Thaler and Cass Sunstein describe how public policies could be developed to shape decision-making.[24] When making complex choices, such as selecting a mortgage company or a health insurance plan, people tend to take mental shortcuts to simplify the process. One such shortcut involves selecting only the most important aspect of the decision. For example, an insurance buyer may compare plans based on whether her doctor is in network and whether the plan covers eye exams, if those are the most important aspects to her. She may not consider whether the plan covers dependents if she does not have any. This can be a helpful shortcut, because it allows the user to minimize the amount of information that needs to be considered.

By framing the decision in a certain way, policymakers and organizations establish a "choice architecture," or the context in which people make decisions.[25] Netflix and Hulu both offer shortcuts to help people decide what TV show or movie to watch, including allowing users to browse by category and displaying recommendations based on previous viewing. Users can still use the toolbar to find a particular show or scroll through the entire catalog if they like. The shortcut options are there to help users who do not know exactly what they want to make decisions based on a few preferences.

To help students make decisions about college, College Measures' Launch My Career tool focuses students on a simple question—what is the return on their investment of time and money in college? While the actual calculation of ROI includes many steps (including estimating time to degree, opportunity costs, estimating work-life earnings based on observations at a few points in time, and discount rates), students receive only two summary ROI measures: how much *extra* the student may expect to make over the next 20 years if they finish a given program and how many years will it take them to "launch" the lifestyle they want. Though students may need additional information (e.g., the availability of certain academic and extracurricular programs, class sizes, campus culture), the summary measure is built on empirical evidence that students care about their chances in the labor market after they graduate. The ROI statistics serve as a shortcut to improved choice.

Beyond shortcuts, choice architects may also shape decisions by explicitly highlighting incentives. Thaler and Sunstein offer the example of how homeowners perceive energy prices. They suggest that thermometers could show the user the cost per hour of lowering the temperature during a heatwave, rather than disclosing the price monthly in a bill. Displaying information about the immediate cost savings of an action would likely have a greater impact on energy usage than monthly cost information. This is a "nudge," or an explicit incentive that provides timely information to help a user make a choice. On a larger scale, nudges have been used to help more students decide to go to college. As an example, Thaler and Sunstein describe how students in San Marcos High School were required to apply to Austin Community College in order to graduate. The high schools brought in additional resources, including guidance counselors, financial aid officers, and admissions staff, to help inform students about the opportunity to go to the college. Between 2004 and 2005, the college-going rate increased 11 percentage points.[26] By providing an incentive to apply to college (tying it to graduation) and making the salient information

available (financial aid and academic expectations), more students successfully met their goals.

These examples illustrate the power of structure and design to help students make good decisions. At the program level, such examples are rarer. Combining program-level information with incentives is typically done through recruitment campaigns or specialized scholarships. There is room for expanding these initiatives, especially through program-level accreditation. Program-level accreditation can be a tool for improving the quality of the options from which students must choose. Existing programmatic accreditation processes can help illustrate how program-level accreditation may lead students to better options by reducing the availability of bad ones. By setting minimum performance requirements, programmatic accreditation can help minimize the risk that students will end up in poorly performing programs. This is effectively a lockout. To this end, program-level accreditation plays several important roles: signaling quality, serving as a gateway to licensure, and serving as a catalyst for learning outcomes assessment.

Many programmatic accreditors specify quality standards using outcomes data, particularly in the health sector. While some accreditors establish specific standards, others require that programs and institutions set their own goals for these standards and report progress toward these goals. For example, the American Association of Colleges of Nursing's Commission on Collegiate Nursing Education requires accredited programs to meet three outcome thresholds: a 70 percent completion rate (Standard IV-B), an 80 percent licensure or certification exam pass rate (Standard IV-C), and a 70 percent employment rate (Standard IV-D).[27] In contrast, the Commission on Dental Accreditation requires programs to set their own program effectiveness goals and assess themselves according to these goals. The commission suggests that programs measure completion rates, employment rates, and licensure exam pass rates (Standard 1-1), but the standards do not offer benchmarks for determining whether a program is successful.[28]

Well-publicized minimum standards for program outcomes, or clear guidance for setting these standards for individual programs, help prospective students make decisions and could eventually help weed out low-performing programs. Given the importance of programs in determining student outcomes, programmatic accreditors and program-level accreditation in general should do more to identify and sanction those that perform poorly. If accreditors are unwilling to specify and enforce stricter quality standards, they should at least make outcomes data more widely available, so that prospective students do not have to rely solely on their stamp of approval when selecting programs.

Conclusion

In this chapter, we have considered how several means of influencing student choice are related to ROI measures, especially measures of graduation, employment, and loan repayment. Each of the methods we discussed had some benefits. First, we addressed how information influences decision-making. Recent efforts to provide more and better information about institutions have focused on students' post-college incomes and employment rates. These efforts have also expanded beyond institution-level information to include program-level outcomes, which reflects just how much variation occurs within institutions. Next, we addressed how changes to students' choice architecture can provide helpful resources when students need them the most—when they are choosing a college, deciding on a major, or even dropping a class. These changes require careful policy designs that anticipate students' actions and ensure that the consequences of decisions are readily evident. In each of these sections, we addressed how accreditation, especially program-level accreditation, can improve students' choices and outcomes.

Program-level accreditation sets quality expectations and reporting requirements at the level where they will make the most difference for students. Providing more information about college students' outcomes or better choice architecture for prospective college students is unlikely to improve students' chances of success if policymakers cannot ensure that students' available options are of the highest possible quality. Program-level accreditation should also be used to enforce quality standards and remove poor options from students' choice sets.

This discussion also revealed several areas for improvement. Students' choices and outcomes could be vastly improved through better coordination among information-focused efforts, nudges, and accreditation. The program-level information that students need to make wise choices about colleges and majors should be the same information that accreditors collect. This information should be made available to students when it is most important and in a way that is easily understandable. Employers, institutions, governments, and third parties should work together to collect and disseminate this information, in addition to holding each party accountable for improving the quality of students' paths through college.

We recognize that this is a tall order. Encouragingly, there are already several efforts under way in this direction. Efforts to define and improve program quality outside the accreditation process, such as the Degree Qualifications Profile (DQP) and Tuning initiatives, show that faculty, administrators, and accreditors are open to more activity in the realm of choice improvement. The DQP defines what stu-

dents who earn associate's, bachelor's, and master's degrees should know and be able to do, while Tuning identifies learning outcomes at the program level.[29] Both initiatives are led by faculty and academic experts, in concert with institutional leaders and some accreditors, including the Association of Specialized and Professional Accreditors. These collaborative efforts connect learning outcomes to career pathways and employer needs, making it easier for students to understand how programs will lead to a job after graduation. Setting rigorous, transparent standards is the first step in helping students make informed choices among high-quality programs.

Another group of stakeholders is working to improve student outcomes standards and reporting through accreditors. ED's experimental sites initiative, Educational Quality through Innovative Partnerships (EQUIP), explores how alternative forms of accreditation could improve quality assurance at the program level. As described in chapter 7 (LeBlanc), there are eight participants, each including a college or university, a nontraditional provider, and a quality assurance entity. The quality assurance entities will focus on measuring student outcomes, such as completion rates, learning, student loan repayment, earnings after leaving the program, and other employment data, and will allow ED to "evaluate the effectiveness of these providers,"[30] something that accreditation does not traditionally aim to do. EQUIP's quality assurance process will ensure that students' outcomes at the program level are directly tied to program availability, albeit on a small scale.

Expanding the Tuning initiative or EQUIP's quality assurance process to all programs would be expensive and complex, while strengthening the role of existing programmatic accreditors has its own challenges. Without statutory changes that mandate federal recognition of all programmatic accreditors, regional and national accreditors would have to take on a large part of program-level work. It is unlikely that ED would have the resources or political backing to make the necessary reforms on their own. Through a partnership with accreditors, organizations like CHEA and ASPA, and institutions and programs themselves, it may be possible to make strides toward improving program quality. Ultimately, all would benefit from enhanced student success and reputational strength.

It is unclear how the DQP, Tuning, and EQUIP will evolve over the next few years. At this writing, we do not know the Trump administration's plans for accreditation. President Trump has expressed a wish to decrease the federal role in education. An expansion of program-level accreditation could still occur at the local level and would not require federal involvement. In fact, changes in what the public expects from education often come from the ground up. Data reporting may

also shift under the new administration. If Secretary of Education Betsy DeVos, a proponent of increasing student choice at the elementary and secondary school levels, is equally focused on student choice at the postsecondary level, we may even see a push for program-level reporting of student outcomes. By increasing public access to information about student outcomes, students may have a better shot at finding and choosing among high-quality programs.

NOTES

1. Mark Schneider, *Labor Market Experiences after Postsecondary Education: Earnings and Other Outcomes of Florida's Postsecondary Graduates and Completers* (Washington, DC: American Institutes for Research, 2015), http://www.air.org/resource/labor-market-experiences-after-postsecondary-education-earnings-and-other-outcomes-florida.

2. Anne Grosso de Leon, "The Collegiate Learning Assessment: A Tool for Measuring the Value Added of a Liberal Arts Education," *Carnegie Results* (2007): 1–12.

3. See "Measuring Higher Education Outcomes—Gallup-Purdue Index," Purdue University, http://www.purdue.edu/newsroom/gallup/, and "Gallup-Purdue Index," Gallup, 2017, http://www.gallup.com/topic/gallup_purdue_index.aspx.

4. Many states, including those that partner with College Measures, report program-level data. Note that College Measures is affiliated with the authors. See http://www.air.org/center/college-measures or the Workforce Data Quality Campaign.

5. "Data documentation," US Department of Education, accessed September 9, 2016, https://collegescorecard.ed.gov/assets/FullDataDocumentation.pdf; Schneider, *Labor Market Experiences After Postsecondary Education*.

6. Nicholas Hillman and Taylor Weichman, *Education Deserts: The Continued Significance of "Place" in the Twenty-First Century* (Washington, DC: American Council on Education, 2016), http://www.acenet.edu/news-room/Pages/CPRS-Viewpoints-Education-Deserts.aspx.

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8. Loan Forgiveness for Service in Areas of National Need, 20 USC § 1078-11 (1998).

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12. For the sake of simplicity, this discussion leaves aside the issue of affordability. Budget constraints are also a component of the economic model of rational decision-making.

13. Stephen L. DesJardins and Robert K. Toutkoushian, "Are Students Really Rational? The Development of Rational Thought and Its Application to Student Choice," *Higher Education: Handbook of Theory and Research* 20 (2006): 191–240.

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15. Andrew Kelly and Mark Schneider, *Filling in the Blanks: How Information Can Affect Choice in Higher Education* (Washington, DC: American Enterprise Institute, 2011), https://www.aei.org/publication/filling-in-the-blanks/.

16. "Nudging for Success: Using Behavioral Science to Improve the Postsecondary Student Journey," ideas42, accessed June 29, 2916. http://www.ideas42.org/pse/.

17. "Launch My Career," College Measures, US Chamber of Commerce Foundation, and Gallup, Inc., accessed January 31, 2017, https://www.uschamberfoundation.org/center-education-and-workforce/launch-my-career.

18. College Measures currently works with Colorado, Florida, Minnesota, Tennessee, Texas, and Rhode Island, and also recently began a project with Virginia.

19. The data cited here provide information about the institutional accrediting activity of the given programmatic accrediting agency. Most of the federally recognized "specialty/programmatic" accreditors are authorized not only as accreditors of programs but also of what could be called "single purpose or specialized" institutions. The total number of programs accredited by that accreditor is not provided in this data, nor are all of the students in those programs represented.

20. Peter Ewell, Karen Paulson, and Jillian Kinzie, *Down and In: Assessment Practices at the Program Level* (Champaign, IL: National Institute for Learning Outcomes Assessment, 2011), http://www.learningoutcomeassessment.org/DownAndIn.htm.

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Does Accreditation Protect Students Effectively?

Barmak Nassirian and Thomas L. Harnisch

Accreditation agencies are seen as entities that can provide assurances to students regarding educational quality. Yet over the past 20 years, accredited institutions have been repeatedly cited for low quality, raising the question of how effectively accreditation serves in a consumer information and protection role.

With the recent collapses of major for-profit colleges and widespread alarm caused by the size and repercussions of student debt, there is growing public concern about the quality of higher education. Public anxiety about educational quality has focused unprecedented attention on accreditation's role in protecting students from fraudulent or low-quality institutions. Accreditation has long served a unique, central role in quality assurance in higher education, although its various stakeholders conceptualize the quality assurance function in different ways. Within the higher education community, stakeholders view accreditation as a vehicle for quality improvement, articulated by faculty and administrators in academic terms such as promotion of institutional mission, adequacy of curricular and instructional resources, and advancement of learning. Outside the academy, in contrast, the public and the numerous third parties who rely on credentials awarded by institutions view accreditation as a consumer protection mechanism and guarantor of institutional legitimacy.

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Internal and external stakeholders may differ in their framing of accreditation, but they are not substantively far apart in that any quality assessment regime should, at the very least, be able to separate legitimate educational services from counterfeits. Despite accreditation's record of fostering a diverse, robust community of legitimate colleges and universities over the past century, it has not been immune to breach by predatory and low-quality institutions. These institutions, upon gaining approval and public legitimacy from accrediting bodies, have defrauded or shortchanged students and taxpayers, leaving students with credentials of little value, debt loads that do not align with their projected earnings, and little or no return on taxpayer investment. As evidence of poor outcomes and the public and private costs of deceptive or abusive practices have accumulated, the cacophony of calls for overhauling accreditation has come to dominate the policy conversation about the future of quality assurance in higher education.

In this chapter, we explore the challenges and shortcomings of accreditation today, and conclude that accreditation as it is currently configured is ill-equipped to protect students from fraudulent or low-quality institutions of higher education. We first examine the fundamental challenge of evaluating the quality of a long-term "experience service" such as a college education, and the role that accreditation plays in responding to that challenge. We then review higher education's federal gatekeeping "Triad" and its near-exclusive reliance on accreditation for substantive institutional evaluation, with the states and the federal government assuming generally procedural roles in the gatekeeping process. The chapter concludes with policy recommendations to improve and preserve accreditation.

Accreditation's Challenge: Assessing the Quality of a Long-Term Experience Good

A fundamental challenge to accreditation's role in assessing academic quality is the complexity of evaluating long-term experience services. Economic research indicates key differences in the ability of consumers to judge the quality of tangible goods versus the quality of intangible "experience" services.[1] Tangible goods are more susceptible to inspection and evaluation by the consumer prior to the purchase and are usually objects of repeat transactions that generate a critical mass of judgments regarding their attributes, including their quality.

Experience services, in contrast, are generally ephemeral and individuated in their effects because of their interactive nature. They typically require specific behaviors from the consumer to produce promised results (e.g., gym memberships, diet plans, music lessons). Even within the various types of experience

services, there are differences between short- and long-term experiences. For example, there are significant differences among more immediately verifiable short-term services, such as a dry cleaner's performance, and longer-term results of less frequent, but more consequential, transactions, such as a college education. With long-term experience goods, consumers are far less able to make informed decisions based on direct observation or examination of the provider and need reliable sources of objective information to make informed choices.

The significant knowledge gaps in most experience services has led to the emergence of third-party validators who fill the market's information vacuum with expert reviews and analyses, quality thresholds and rankings to help guide consumer decisions. Examples of these include independent entities such as Consumer Union and its *Consumer Reports*; organizations sponsored by reliant industries such as the Insurance Institute for Highway Safety, which rates automobile safety and repair costs on behalf of the insurance industry; and commercial entities selling their own services, such as *Good Housekeeping* magazine's paradigmatic "Seal of Approval."

Another model of quality assurance in experience services consists of self-regulatory bodies organized by the service sectors themselves. Medicine is the most notable example of this type of third-party oversight, organized by the medical profession to ensure a threshold of competence for medical practitioners. Medical services are complex, consequential, have a temporal lag between treatment and outcomes, and are inherently difficult to assess—negative patient outcomes do not necessarily suggest poor care, nor do positive outcomes necessarily indicate provider competence—and there is a public need for not only information but robust upfront oversight.

Among long-term experience goods, a college education has several unique characteristics that present challenges to assessing quality. First, there is a long-time lag between enrollment and determination of outcomes. While optimal academic outcomes (i.e., graduation) can be measured in a few years, evidence of the economic benefits of college in terms of employment and earnings takes decades to materialize. Furthermore, even after the outcomes are known, former students confront the challenge of parsing the underlying causes for their results. Especially in cases where promised results do not materialize, it is difficult to discern whether any failure was mainly due to institutional shortcomings, inadequate student effort, or other circumstances. Unlike more frequently purchased "search goods," most students enroll only once or twice in college during their lifetime, so there is little by way of accumulated experiences to guide individuals. Further,

each college experience will be unique to each student. And unlike search goods, where individuals have ready access to numerous firsthand experiences of family and friends with a limited number of brands, there tend to be few former students of the same postsecondary institutions in any social circle.[2]

In many respects, the challenge of assessing quality in higher education resembles medical services. Just as the outwardly attributes of medically effective drugs and snake-oil remedies are often difficult for consumers to tell apart, legitimate postsecondary education is difficult to distinguish from the ersatz. Recognizing the difference between a calculus course and a remedial algebra course presented as calculus, for example, requires knowledge of mathematics. Otherwise, nonmathematical consumers would observe identical phenomena: a classroom, students, a teacher, and mathematical symbols that they may not be able to independently decipher. In addition, just as with long-term medical services, there is a temporal separation between enrollment and verifiable outcomes. And like medicine, education—because of the time, cost, and effort it involves—is a high-stakes transaction. Lastly, failure to achieve desired outcomes in a course does not necessarily imply lack of institutional adequacy, nor does success in subpar or misrepresented courses indicate delivery of promised results.

Accreditation as a Third-Party Validator

Accreditation is the higher education community's effort to address the consumer knowledge gap inherent to the collegiate experience. While rooted in voluntary arrangement among institutions driven by their need for mutual validation, it also serves a consumer protection role by ensuring the adequacy of academic offerings. By the evidence of significant instances of waste, fraud, and abuse by accredited institutions,[3] however, some accrediting bodies have failed to discharge their obligations in this regard, and most have notable weaknesses in identifying institutional misconduct. Compounding their inability to remove counterfeits from the market they regulate, accreditors also face backlash for failure to address gradations of quality or deal with low-performing institutions. This latter item, afflicting institutions in all sectors of higher education, is primarily driven by changes in the financing of higher education and by the fact that too many former students of subpar institutions are left worse off due to educational debt. The complexity of assessing the quality of higher education through accreditation has manifested itself in two ways: a failure to detect outright fraud and an unwillingness to adequately sanction low-performing institutions that are not engaged in fraud but have significant deficiencies. To understand the extent

to which accreditation may be held accountable for specific institutional or consumer outcomes, it needs to be placed in a broader gatekeeping context.

Pressure on Accreditation: A Weak Regulatory Triad

Beyond the evidentiary and methodological challenges inherent in assessing the quality of a long-term experience service, accreditation is also hobbled by the weak regulatory Triad within which it plays a gatekeeping role for federal financial aid purposes. In order for an institution to qualify for federal Title IV financial aid and other federal benefits, it must be legally authorized to operate in a state, accredited by a recognized accrediting body, and certified by the federal government. In this regulatory structure, the states authorize institutions to operate and protect consumers from fraudulent business practices, accreditors assure academic quality, and the federal government certifies that institutions have the administrative and financial capacity to participate in federal aid programs.

While the Triad's three-legged regulatory approach offers the veneer of a multilayered consumer protection and quality assurance system, in practice it has proven cumbersome, uncoordinated, and ineffective.[4] The state and federal legs of the Triad are almost entirely procedural and devoid of substance. The procedural nature of the federal and state components has rendered them into perfect illustrations of Weberian instrumental rationality (*zweckrationalität*): bureaucratic sets of formal rules—focused on governing the intermediate means to an end—that are, however, unable to take cognizance of the substantive outcomes the rules are designed to effectuate.[5] The federal and state functions focus on compliance with technical rules that micromanage various administrative and financial behaviors of education providers but are entirely agnostic on whether the educational services in question are legitimate. As a result, the entire weight of substantive gatekeeping (whether the educational programs are remotely legitimate, and if so, whether they pass some minimal quality threshold) have fallen on accreditors as the only real safeguards against unscrupulous or ineffective institutions.

The shortcomings of the other two legs of the Triad have transformed accreditation—now the last line of defense against fraud and institutional misconduct—in counterproductive ways. As policymakers have lost confidence in the state and federal actors, they have expanded the list of specific criteria that secretarially recognized accreditors have to review. This systemic mission creep has pushed accreditors away from their historic and essential function of assessing and rendering judgment on legitimacy and adequacy of academic quality at institutions, replacing it with a compliance checklist form of instrumental rationality.

But neither the general failings of its two other partners in the Triad nor the unreasonable broadening of accreditation's oversight portfolio can entirely absolve accreditors of direct responsibility for deficiencies (and in some cases catastrophic failures) in their discharge of their core function of quality assurance. The most prevalent forms of fraud and abuse in the postsecondary marketplace are designed to take advantage of consumers' inability to assess the quality of the experience service they are purchasing. Accreditation could prevent deceptive acts and practices against consumers (e.g., misrepresentation of actual risks, potential benefits, or relative value of services offered at a given price) that emanate from that fundamental consumer inability. While some argue that accreditors are tasked with too lengthy a list of oversight obligations for any one entity to perform well, if accreditation could effectively assure minimal acceptable quality and provide clearer indications of institutional comparability and relative quality, much of the rest of the unfair, deceptive, or abusive acts or practices in the postsecondary sector would be significantly mitigated.

Admittedly, accrediting bodies have always evaluated institutions under their purview on a pass/fail basis and do not purport to provide meaningful information about *relative* quality of institutions that meet their criteria for full accreditation. All additional quality nuances beyond being accredited reside in the "quality improvement through peer review" process by which each institution is deemed to have met its own self-set goals. This aspect of accreditation, best understood as an increasingly vestigial relic of past practice, is too obscure for consumers to decipher and has little to do with institutional eligibility to participate in federal programs. For accreditation to regain public trust, however, some additional codification of institutional quality is needed for consumers to be able to make informed decisions.

Accreditation and the Erosion of Trust

There are grounds for significant concerns with the adequacy and efficacy of accreditation today. Accreditation has not kept pace with foundational shifts and gradual changes in federal policy and the higher education industry over the past half century. Escalating tuition dependency, the gradual decline of the faculty's influence within the academy, and the rise of for-profit colleges, for example, have introduced risk factors that accreditation did not face in its original—and largely unchanged—design.

Perhaps the most transformative change was the decision to utilize accreditors as gatekeepers for federal financial aid programs in the first place. Accreditors accepted this quasi-governmental role without fully anticipating the ways

in which it might change institutional behavior and thus necessitate changes to oversight processes. For example, with federal dollars conditioned upon its seal of approval, accreditation has become voluntary in name only for the vast majority of institutions of higher education. The erosion of their claims of voluntary status is most evident in the ever-growing number of federal gatekeeping functions that secretarially recognized institutional accreditors must now perform. Neither the discharge of these functions nor the relationship between accreditors and the institutions that they oversee are voluntary anymore. In such an environment, institutional compliance with rules can no longer be taken for granted but must be assured through more robust enforcement practices than the federal government presently deploys against accreditors or than the latter deploy vis-à-vis the institutions they approve.

Given the tie-in with eligibility for federal funding, the ongoing policy conversation about accreditation is primarily focused on federal priorities. These include protecting students, safeguarding federal financial support for higher education, and potentially reducing costs through innovation. In this context, concerns about accreditation primarily focus on public anxiety about graduation rates, higher education's uncertain academic and labor-market outcomes, escalating student debt, and outright consumer fraud. Ironically, at the same time as accreditors are accused of not doing enough to protect students and taxpayers from unscrupulous schools, they have been criticized for their unwillingness to allow new and untested providers to access federal funds.[6]

The erosion of public trust in the quality assurance process has amplified scrutiny of the internal workings of accreditation. For decades, accreditation was largely unquestioned as the "black box" of higher education because policymakers and the public viewed institutional outcomes as either satisfactory or, at the very least, defensible. The accumulation of incidents of predatory conduct, unrelenting tuition inflation, and the massive growth of student debt and defaults, however, has created signs of likely trouble ahead for accreditation. In addition, there are renewed political and financial pressures to expand public financing to new providers that are currently ineligible for federal aid programs because they cannot navigate accreditation's standard requirements. Indeed, the primary political barrier to overhauling accreditation's role in federal programs may well be a lack of consensus about a feasible alternative.[7]

While many of the procedural steps leading to a final accreditation decision are transparent, accreditors' internal deliberations and their normative exercise of judgment are not. This is partly due to concerns for protection of institutional in-

formation, administrative convenience, and risk management. As with all high-risk bureaucratic undertakings, traditionalism and process conservatism also contribute to some degree of unnecessary secrecy surrounding accreditation. Regardless of its underlying causality, the opacity of accreditation—accreditation as a black box—reduces the empirical basis for assessing accreditors to the outcomes associated with postsecondary institutions that they approve. And it is that phenomenon (the performance and the behavior of accredited institutions) that has landed accrediting bodies and the concept of accreditation in recent trouble.

A Higher Education Landscape Marred by Waste, Fraud, and Abuse

American higher education has a storied history of contributing to scientific, cultural, and economic vitality of the nation but has not been immune to malfeasance and abuse. Diploma mills and fake credentialing were the earliest manifestations of corruption in postsecondary education, but the introduction of public financing and the extraordinary growth of higher education in the post–World War II era expanded opportunities for swindling students and taxpayers for billions for dollars. Weak gatekeeping from accrediting bodies combined with a rapidly evolving, corporate-style higher education marketplace revealed and exacerbated fundamental quality assurance problems in higher education.

The pivotal role assigned to accrediting bodies expanded upon the enactment of the Higher Education Act (HEA) in 1965, which also relied on accreditation status as an eligibility requirement. The availability of a preexisting (and operational) higher education quality assurance mechanism eliminated the need for the federal government to get involved in substantive decisions on the legitimacy of eligible institutions.

While collegiate accreditation long preceded its deployment as a gatekeeper for federal dollars, this was not the case with the for-profit college sector, which at that time consisted almost exclusively of vocational training providers. In the absence of a genuine and preexisting parallel framework for quality assurance, the sector moved to comply with federal eligibility requirements through the establishment of its own national institutional accrediting bodies modeled after collegiate accreditors. While the structure and formal processes of these bodies were nearly identical to those of collegiate accreditors, their primary purpose was to facilitate access to federal funds. The Accrediting Commission of the National Association of Trade and Technical Schools (NATTS), for example, was founded in 1965 as the accrediting arm of NATTS, the schools' trade association and lobbying organization. The accreditor and the schools' advocacy group operated under

the same governance and from the same offices until 1993, when changes in federal law prohibited the practice in the aftermath of hearings on waste, fraud, and abuse in higher education.[8] Formal and open regulatory capture—the control of a regulator by the regulated entities—would later evolve into more subtle modes of control through which all accreditors would remain dependent on the institutions they oversee for funding, expertise, and advocacy.

A significant feature of the for-profit sector's adoption of traditional accreditation was the astute and fateful decision not to modify its processes—developed in a nonprofit collegiate environment—to better address the markedly different institutional motivations and governance structures of profit-seeking providers. Porting the collegiate model without modifications disregarded the absence of disinterested governance of these corporations, as well as its lack of traditions of faculty tenure and control of educational programs. The ill-fitting and purely instrumental application of collegiate accreditation practices to fundamentally different providers would soon unleash a heavy cycle of waste, fraud, and abuse due to poor academic oversight.

Evidence of fraud in higher education was alarming enough as early as the 1970s to lead the states to take action to protect consumers.[9] But the first significant cycle of systemic abuse in federal student aid programs began to build up within the for-profit sector starting in the 1980s, when deregulation and lax oversight created an environment conducive to institutional misconduct and fraud. As would later be documented in hearings by the Senate Committee on Governmental Affairs (Nunn hearings), the fraud that overtook the sector resembled typical elements of consumer fraud. These included passing fake educational programs as legitimate (e.g., the Culinary School of Washington, a school featured in the Nunn investigation), as well as acts of procedural deception and fraud, such as forging students' signatures on promissory notes for student loans. The report issued by the Nunn hearings held accreditors responsible for failing to police the former types of misconduct (i.e., admission of fake or subpar programs into Title IV). The Nunn subcommittee flagged the second category of illegal or objectionable practices—forging signature, deceiving students into signing promissory notes, commissioned recruiting, and so forth—as the responsibility of the Department of Education and the states.

By the early 1990s, escalating costs of student loan defaults and its destabilizing effect on the student loan system forced Congress to crack down on waste, fraud, and abuse in the federal student aid system. The most effective of these addressed process issues identified in the Nunn hearings. The 1992 reauthoriza-

tion of the HEA made significant improvements to the federal program participation requirements. These included a ban on commissioned recruiting, critical improvements to oversight of the administrative capability and financial responsibility of participating schools, a cap on the maximum amount of revenues any for-profit school could derive from the aid programs, limits on institutional hiring of individuals previously involved in misuse of federal funds, and expulsion of correspondence programs. These changes were immediately effective in ending the most egregious forms of procedural fraud and abuse in Title IV but were understood not to address the foundational issue of quality and legitimacy, for which Congress would still look to accreditors.

Beyond the changes to federal oversight, the 1992 amendments also significantly expanded and fortified the state authorization component of the Triad, admittedly in ways that some observers viewed as overstepping accreditation's jurisdiction on academic quality. The State Postsecondary Review Entities (SPREs) authorized in that legislation were a clear policy response to the range of problems afflicting the gatekeeping of federal aid programs that the Nunn hearings put on national display. While the SPRE authorization largely focused on administrative and financial performance metrics to trigger risk-based reviews, the standards to be used for such reviews certainly came close to an evaluation of substantive legitimacy of programs and might have addressed the Nunn report's concern about completely fraudulent programs gaining easy access to federal aid. The SPREs' likely efficacy in containing abusive practices and promoting quality remains unknown since Congress rescinded their authorization shortly after the Republican congressional takeover in 1995.[10]

The process leading to the 1992 reauthorization represented a critical turning point for accreditation as well. First, it was the earliest public questioning of accreditation as a reliable gatekeeping mechanism under the HEA. Second, it made significant changes not only to the federal functions that accrediting bodies seeking secretarial recognition would commit to perform but reconceptualized the relationship between accreditors and the institutions they oversee by requiring accrediting bodies to be independent of the schools. Finally, by significantly strengthening federal and state procedural safeguards against petty abuse, but failing to resolve the academic quality conundrum, it left a path of least resistance for corporate schemes that focused almost entirely on passing off counterfeit and subpar programs as the real thing. In the years that followed, this turned out to be a threat that the other two components of the Triad had no jurisdiction on, and one that accreditors—who did have such jurisdiction—proved unable to contain.

A New Era of Fraud and Abuse Emerges in the 1990s

Even as post-1992 changes in the law were effectively cleaning up the morass of the previous decade's excesses, changes within the postsecondary sector were building up pressures for a new cycle of waste, fraud, and abuse. Several dynamics were beginning to converge in the early 1990s to create a fertile environment for abuse of student and taxpayer dollars. First, the changing nature of the American economy and the job market was making education and training beyond higher education a necessity for the maintenance of a middle-class lifestyle. As lifelong learning and adult "nontraditional" students flocked to postsecondary education, market opportunities for colleges and universities—particularly nimbler for-profits that historically catered to older, more vocationally focused students—expanded. Second, for-profit colleges, which were historically smaller family-owned businesses, began to evolve into large corporate operations, some of which would become giant publicly traded companies by the decade's end. Third, the for-profit sector began to pivot away from its historical roots in short-term vocational certificates and moved aggressively to adopt a collegiate persona by offering academic degrees, a change that required the approval of accreditors. Finally, the gradual emergence of the Internet and distance learning opened up new frontiers for growth that for-profit providers, unfettered by faculty oversight or lack of upfront capital resources, were quick to exploit. By the start of the 2000s, these ingredients were already combining to produce a toxic higher education brew for students and taxpayers.

The for-profit sector's traditional national accreditors, serving as instrumental enablers of access for Title IV funds, went along with changes in the industry and gradually expanded the scope of their secretarial recognition to validate the sector's emerging identity as producers of collegiate credentials. Regional accrediting bodies, with their roots firmly placed in legitimate collegiate practices, proved skeptical at first but gradually came around to extending their imprimatur to for-profit colleges.

As regional bodies began to approve the new providers, however, they failed to make changes to accommodate the unique and distinct features of for-profit colleges. For example, the governance structure of for-profit colleges, like most companies, typically includes a paid board of directors with a financial interest in profit maximization through ownership or stock options.[11] Furthermore, the hierarchical management of for-profit education companies is often masked by a thin veneer of traditional collegiate administration but invariably lacks such salient features of traditional academic structure as tenure and shared governance.

Mission statements of larger for-profit providers, for example, should have set off alarms about their uniform omission of profit maximization as the central purpose of their operations.[12] In addition, the absence of a cadre of tenured faculty inside these institutions might have cast some doubt on the veracity and reliability of the self-studies generated for securing regional accreditation.

In this connection, it is worth noting that accrediting bodies do not have the resources to conduct thorough fact-finding or investigate institutional representations. Accreditation visits are too short and too choreographed for discovery of intentionally hidden facts about an institution. In this respect, accreditation resembles a desk audit, a review of paperwork based on the belief that the representations made in the documents under review are truthful and complete. Whether such an assumption about any institution staffed by at-will faculty can be reasonable should have been the subject of serious concern. But even regional accrediting bodies, increasingly the accreditors of choice for corporate universities seeking to offer doctorates, failed to anticipate breaches of their historical protocols by sophisticated new providers with vastly more resources to manipulate the process.

Adding to the vexing complexity of how to judge new providers was the advent of web-based distance education, which posed its own unprecedented challenges. By the mid-2000s, a business-friendly George W. Bush administration had already loosened program integrity restrictions in student aid programs. The administration effectively ended the congressional ban on commissioned sales through regulations in 2002,[13] but even more notably adopted an enforcement and oversight posture that signaled its laissez-faire philosophy to the industry.[14]

Perhaps the most significant change in program integrity came in 2006, when Congress removed an important safeguard against systemic fraud by eliminating the rule that prevented for-profit colleges from enrolling more than half of their students via distance education offerings.[15] This change was a critical turning point because on the revenue side of the profit-loss equation, it eliminated the need for some physical contact with students, thus enabling for-profit colleges to recruit nationally. But even more notably, it eliminated physical infrastructure requirements and drastically reduced faculty costs on the expense side of business operations. The period immediately after its enactment ushered in the "golden age" of for-profit education, with soaring share prices and company valuations, driven mainly by online enrollments.

Accreditors did not take preemptive note of how distance-delivered programs may require new oversight procedures. Further, even ex post facto implications of the change for academic quality and integrity made little impression

on accrediting bodies. An egregious example of this was the case of a for-profit company that purchased a small Franciscan liberal arts college in Iowa in 2005 and obtained regional accreditation through the acquisition. The extant accreditor's due diligence in approving a change of institutional ownership from a mendicant order of the Catholic Church to a company owned by a Wall Street private equity firm remains unknown. In retrospect, it is difficult to understand how the accreditor could fail to take notice of the subsequent trajectory of enrollments, which increased from 968 in 2005 to 77,179 in 2010 without a commensurable increase in qualified faculty and other services.[16] Subsequent legal entanglements of the company included investigations or settlements with the Departments of Education and Justice, the Consumer Financial Protection Bureau, the Securities and Exchange Commission, and multiple state Attorneys General (AGs).[17]

Congressional Hearings and Lawsuits in the Obama Era

Beginning in 2010, the consequences of years of lax oversight and inadequate regulation of the sector began to register with the public and policymakers in the form of mounting student complaints and a steady drumbeat of media coverage.[18] Under the chairmanship of Senator Tom Harkin (D-IA), the Senate Health, Education, Labor and Pensions (HELP) Committee held a series of high-profile hearings highlighting the sector's relentless pursuit of profits through predatory recruitment practices, proliferation of programs of questionable quality, and exorbitant prices financed with federal student aid.

In 2012, the committee published a final report that detailed the history of for-profit colleges' explosive growth, which had by then expanded to capture up to 12 percent of all enrollments while consuming one-quarter of Pell Grant funding and generating nearly half of all measurable defaults.[19] The report documented a recognizable pattern of consumer fraud and abuse, devastating levels of debt for worthless programs, as well as the rich rewards reaped by company executives and shareholders. Abusive institutional practices included heavy-handed recruitment of prospective students,[20] nonexistent admissions standards, falsification of job placement rates, underqualified faculty, inadequate curricular standards, and breaches of academic integrity—all of which were remarkably public and well within the purview of institutional accreditors.

State AGs and federal agencies also investigated the sector. Starting in 2011, a group of AGs began to coordinate their investigations of for-profit colleges in a manner that was reminiscent of the tobacco settlements.[21] By early 2017, 37 state

AGs had joined the effort—and in some cases settled—investigations of consumer fraud by for-profits. The common themes in these investigations included allegations of illegal and abusive enrollment and recruitment practices, misrepresentation of programs and job placements, failing to offer the education that students were borrowing to finance,[22] and poor qualification of institutional staff. Federal agencies and a number of private false claims and class action lawsuits consistently featured the same patterns of fraud and abuse by accredited for-profit providers. By the mid-2010s, only a few of these actions had resulted in actual convictions, although a number settled without admissions of wrongdoing by the schools.

The Decline of the For-Profit College Sector

The Obama administration, having inadvertently propped up the sector in its early years through significantly expanded student aid and post-2008 stimulus funding,[23] began a regulatory process that slowly clamped down on the sector's most egregious practices. In a series of regulatory changes beginning in 2010, the administration attempted to impose additional program integrity measures ranging from a restoration of the ban on commissioned recruiting to the development of a complicated "gainful employment" rule to ensure some measure of accountability for postsecondary programs that left their graduates in untenable financial circumstances. By the middle of the second Obama term, however, a more important verdict about the quality and the value of for-profit credentials had already been delivered in the court of public opinion. Plummeting enrollments and disappointing earnings began to produce disastrous consequences for the financial stability of many for-profits, leading to the precipitous collapse of two large industry players: Corinthian Colleges and ITT Technical Institutes.[24]

The extent of inadequate academic oversight of these publicly traded companies has been extensively documented in the subsequent efforts to address the plight of their former students. Federal efforts to provide defenses to repayment on student loans, for example, have focused on substantial misrepresentation and recruitment practices by institutions. And a class of former ITT students moved to intervene in ITT bankruptcy proceedings with a $7.3 billion claim for fraud.[25] Their federal court filing included more than a thousand pages of firsthand accounts and testimony on misrepresentation of programs and job placement rates by ITT.[26] While Corinthian and ITT were particularly ubiquitous examples, they were by no means the only for-profits to implode and leave students and taxpayers with little to no recourse.[27]

Even as the efforts to clean up the aftermath of the rise and fall of the for-profit collegiate model is continuing, a decisive consensus on accreditation's role, culpability, and future suitability for substantive oversight of higher education has not emerged. This is partly because the evolution of for-profit providers was not entirely limited to pro forma accreditation by the sector's traditional accrediting bodies, which could be dismissed as willfully negligent of their duties, as at least one of them was found to have been.[28] The involvement of well-respected regional accreditors with for-profits that were later found to have been fraudulent providers[29] has cast serious doubt on whether the accreditation model itself may be flawed and in need of total replacement.[30] In retrospect, regional accreditors' accommodation of for-profit colleges may be partially explained by the pressures they faced to demonstrate openness to new delivery models. But that they failed to take cognizance of the evidence of the sector's excesses in connection with specific statutorily mandated standards[31]—including student success, curricular and faculty issues, recruitment, and records of student complaints—represents a significant failure to carry out their duties.

Beyond Fraud: Accreditation's Failure to Recognize Quality Today

Misgivings about accreditation are not limited to its shortcomings in the for-profit context. Indeed, given instances of failure to distinguish counterfeits from legitimate institutions, it should come as no surprise that there are misgivings about the accreditors' exercise of decisive judgment regarding relative quality. While for-profits pose a specific type of threat—in the form of profit maximization—to academic quality, public and nonprofit institutions are not immune to erosion of quality, albeit for other reasons. Lack of adequate resources, political interference, pressures to balance budgets, and poor institutional leadership pose significant risks to academic quality and to students. While the relative presence of the former (i.e., academic quality as an abstraction) may be too amorphous to gauge, stark disparities in student outcomes are quantifiable. Nowhere is the contrast between accreditors' assessment of adequate institutional quality and student outcomes more vivid than in institutional graduation rates of some accredited institutions.

In recent years, the alarming growth of educational debt has placed such academic outcomes as graduation rates in a new economic context. Because the vast majority of low- and moderate-income students have to borrow in order to attend even comparatively low-priced institutions, whether they complete their programs has enormous long-term economic consequences for them and the taxpayers.[32] Institutional graduation rates take on a new meaning in light of the high stakes for

students carrying debt without a credential. Of course, few experience services offer 100 percent success rates, but prospective students are rarely informed of institutional graduation rates, let alone counseled about their individual odds of completion, by institutions that admit them.

While the use of graduation rates as a measure of institutional success is debatable, there are clear grounds for concern in view of what is currently known about degree completion in various sectors of higher education. Ominously, the odds of student success, as measured by official graduation rates, are decreasing,[33] even as the volume of outstanding educational debt is increasing. And at several hundred accredited institutions, the rates stand below half of their respective sector's average graduation rates. While accrediting bodies have historically failed to take note of extremely low graduation rates as possibly reflective of academic quality, public alarm about student success has forced a conversation that is increasingly focused on them as measurable outcomes.[34] Indeed, in late 2016, the group consisting of the seven regional accreditors launched an initiative to review institutions with low graduation rates.

In some ways, the prevalence of this type of failing is indicative of the ways in which accrediting bodies have been oblivious to systemic changes in the industry. The foundational practices of legitimate accreditation—institutional self-study, self-set institutional goals, data on institutional progress, and virtually all other institutional claims—were developed in an era when an independent faculty exercised near-sovereignty on matters academic and when institutions were generously supported by the states or private patrons. Over the past few decades, those dynamics have given way to a new higher education reality. Chief among these are the gradual privatization of public higher education, increased tuition dependency in all sectors, the corporatization of higher education in which the faculty have lost ever-greater control to administrators responsible for the bottom line, and the ensuing consumerization of higher education. These attributes have fundamentally altered the behaviors and the motivations of institutions by emphasizing revenue generation and cost reductions that have inevitably put academic quality (the ephemeral but central component of the educational experience) under duress. The erosion of faculty authority, which historically served as a countervailing force in favor of greater expenditures on academic priorities, has been damaging in two distinct ways. Internally, it has resulted in budget-driven choices (most notably the use of adjuncts but also changes in academic and student support policies) that have significantly undermined the value proposition offered to today's students compared to students of a few decades ago. Even more relevant to accreditation,

weaker and more docile faculty are less reliable internal partners to accrediting bodies, which increasingly engage administrators as their campus interlocutors.

By failing to recognize and adjust to these changes, and in clinging to practices that were rational in a bygone era but have little relevance to today's higher education practice, accrediting bodies have prioritized ritual over reality. When public institutions were either free or very low-cost, for example, high dropout rates at open admission institutions did not represent a substantial threat to students. As debt financing of higher education became the norm rather than the exception, accreditors' failure to address the plight of students attending institutions with student loan default rates higher than their graduation rates significantly damaged their reputation.[35]

How to Reform Accreditation

For much of its history, accreditation played the role of an industry-sponsored quality assurance regime quite well. While it was a creature of the very institutions that it sought to validate, the internal organization of those institutions and the environment within which it operated allowed accreditation to function as both a quality assurance mechanism that protected consumers and as a quality improvement process that served institutions. Over the course of the past few decades, however, changes within the industry have combined with external dynamics to significantly undermine the reliability of accreditation as a consumer protection measure, as well as its utility as a quality improvement device. General skepticism about accreditation in the federal context has led to various reform proposals, many of which seek to codify quality assurance through measurement of outcomes such as graduation or placement rates. While consideration of outcomes, where objectively available and meaningful, should certainly inform accreditation, we believe that accreditation's historical focus on process and its reliance on academic peer review are indispensable features worth preserving. Indeed, much of accreditation's shortcomings may be ascribed to failure to keep up with changes in the sector it oversees. We believe that a small number of specific changes can reform and strengthen accreditation and, most notably, preserve its nonfederal status.

First, accreditation is too heavily influenced—and in the case of some accreditors, arguably captured—by the institutions it oversees. Regulatory capture and undue influence by institutions were central features of how national accreditors of for-profit colleges were organized.[36] But other accrediting bodies have not been immune to undue influence of institutions through boards of directors that are

overwhelmingly composed of officials from institutions of higher education.[37] While accreditors should certainly be intimately involved in the higher education sector in order to be credible judges of it, some policymakers have objected to having executives of regulated institutions in governance positions with accrediting bodies. Some measure of distance in this regard would not only address such public concerns but may actually improve the quality of judgments by eliminating all conflicts of interest or divided loyalties.

Second, accreditors do not have nearly enough resources to safeguard the enormous sums of federal dollars that are at risk. Currently, accrediting bodies are financed by membership fees that are small fractions of the total volume of dollars-at-risk at institutions they approve. Addressing this resource challenge is an absolute necessity for accreditation to work as intended. If accreditors are expected to perform a federal gatekeeping function, they should be provided federal resources—ideally indexed to the volume of aid flowing to colleges that they oversee—to do the job.

Third, the scope of accreditors' federal obligations should be narrowed and possibly assigned to other members of the Triad. Over the years, as the other components of the Triad have been found to be too procedural to combat fraud, federal law has imposed a broad range of additional responsibilities on accrediting bodies. While some of these are central to academic quality assurance and most certainly belong under the rubric of accreditation, others are less proximate to the task and would be better performed elsewhere.[38]

Fourth, accreditors should develop and adopt more uniform standards for communicating gradations of quality at institutions they oversee to allow for comparative judgments about different institutions. A more readily comprehensible and consumer-friendly method of communicating accreditation's findings to the public should replace the varied gradations of accrediting actions by different bodies. A standardized grading system—akin not only to higher education's own historical practices but also to health inspections of eating establishments—could clearly communicate the accreditors' assessment of quality in manner that the current "pass-fail" grading system does not.

Finally, recognizing that some accreditors may engage in willful violations or gross negligence of their duties, more nuanced punitive alternatives to outright termination should be available to the secretary as intermediate sanctions against accreditors. While willful negligence of institutional misconduct (e.g., as was found to be the case with Accrediting Council for Independent Colleges and Schools and Corinthian) can ultimately only be dealt with through termination,

intermediate punitive sanctions (e.g., fines or limitations on expansion) can also serve as powerful incentives for accrediting bodies that show signs of inadequate practices.

These and other incremental changes can improve accreditation and restore public confidence, thus avoiding a complete governmental takeover of quality assurance.

NOTES

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2. Admittedly, when there are repeat experiences, these are typically positive.

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37. Accreditation and Enhanced Accountability Act of 2016, S. 3380, 114th Congress (2015–2016).

38. Examples include reviews of fiscal and administrative capacity, student complaints, and Title IV compliance issues.

Accreditation

Critical Issues for the Path Forward

Kevin Kinser and Susan D. Phillips

The chapters in this volume have focused on the breadth of concerns about accreditation, and of the causes and possible solutions to the problems it faces. Clearly, this is a contested space; accreditation is on the edge. There are not only different views about what is wrong but also different views about whether accreditation is as problematic as it might be portrayed. Granted, there are many circumstances where its quality assurance processes have worked well—where it has screened out inadequate education and has improved the quality of the education provided. We know institutions have been prodded by accreditation reviews to improve student learning, completion, and success. Accreditation agency standards have also embraced and promoted novel and innovative higher education models, from online learning to competency-based education. However, the fact that accreditation does some things well does not diminish a significantly critical view of accreditation overall. As an enterprise with a venerable tradition, accreditation is now hard-pressed to maintain its standing as a reliable and valued policy framework that undergirds the structure of higher education in the United States.

As the authors here demonstrate, there are clearly many places to point fingers when assessing failures of higher education quality assurance. Institutions have made fraudulent promises or simply failed to ensure that their students learn, graduate, and are prepared to take on gainful employment. There are accreditors that have continued to certify institutions of dubious quality. There is cryptic, uninformative, incomprehensible, and/or meaningless information that is of little

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use to students and the public. In some instances, information that would be useful is simply not accessible. There are quality assurance processes in which actions seem capricious and overreaching. There are policies that have increased, rather than reduced, risks—for students, for institutions, for accreditors, and for the federal dollar. There are state and federal players whose actions are so minimal as to render oversight nonexistent, others whose role is so overbearing as to turn oversight into a bureaucratic straitjacket, and yet others whose proposals take quality assurance so far away from the academic endeavor as to render it unrecognizable. While none of these caricatures is universal, it is clear that much is wrong and much needs to be fixed.

It is also clear that a diversity of perspectives should be considered in mapping a path forward. Five critical issues emerge from the chapters in this volume that represent a set of policy and practice questions to be considered in designing the road ahead. Each, outlined in the following discussion, represents a starting point necessary if proposals for reform are to be founded on a realistic perspective on how and why accreditation operates the way it does. First is the critical understanding of the complexities of accreditation. Although there are cases to be made for knavery—or simple ineptness—in this contested space, it is helpful to begin with recognizing how incredibly complicated and messy accreditation is. Indeed, it is as complicated as the system of higher education it attempts to oversee. A second critical issue is the problematic nature and varying definitions of "quality" in higher education. A corollary here is how quality in the abstract relates to learning and economic outcomes. As a third critical issue, we note the need to address accreditation's triple mission of quality assurance for regulatory purposes, quality improvement for institutional clients, and quality indicators needed for consumer protection. It is not obvious what role takes precedence when these missions are in conflict. Additionally, while it is clear that accreditation is increasingly challenged by its linkages to financial aid, it is unclear whether there is a viable alternative to accreditation waiting in the wings. Fourth, and related to the third, is the issue of information. With information critical to almost every element of the triple mission, its accuracy, relevance, use, and transparency is essential. Finally, the fifth critical issue concerns innovation, and how and why accreditation can foster or impede new educational models and institutional directions. In this concluding chapter, we offer discussion and analysis of each of these critical issues in turn and point to the steps needed to craft a viable path forward.

A Complicated and Messy System

Reforming quality assurance in the United States must begin with recognition of the diversity, variability, and untidiness of both accreditation and the system of higher education it oversees. Accreditation is complicated and difficult to fully understand, even for people who work in higher education.

A Complicated System

There are hundreds of accreditation agencies, only some of which are recognized for the purpose of federal student aid. Some only accredit degree-granting institutions, some only accredit institutions in a limited geographic region, and some only accredit particular academic programs. Some accredit only a handful of institutions, while others are responsible for more than a thousand. They have different histories, too. Some were formed more than a century ago to provide a mechanism for credit transfer, the federal student aid gateway function coming much later. Others grew out of professional associations, with accreditation functions added on. Still others started more recently, with the explicit aim of establishing federal student aid eligibility for the institutions they oversee.

Additional complexity arises because the system of higher education in the United States is itself very complicated. Unlike in most other countries, there is no national ministry of education that can determine higher education policy across the country. Each state has jurisdiction over the educational institutions operating within its borders. The mix of public and private higher education adds yet another angle of complexity, with different types of government authority prevailing over different kinds of institutions. In addition, private institutions can be organized as either nonprofit or for-profit entities. The nonprofits can be religious or secular; for-profits can be owned by publicly traded corporations, venture capitalists, or an individual proprietor. The roles of the other partners in the traditional triad of federal, state, and accreditor also vary. While the federal government has a one-size-fits-all approach to higher education across the country that essentially deputizes accreditation agencies to provide the sole path toward federal student aid, there is wide variety in state oversight. Some states tightly regulate their institutions, requiring accreditation reviews of most institutions and programs. Others adopt a looser approach and allow institutions of higher education to operate with only state approval. With so many potential players in the oversight of higher education quality, accreditation agencies must navigate some tricky waters. Reform efforts that do

not take this diversity of governance into account would undoubtedly encounter similar shoals.

A Messy Solution

As a consequence of this complexity, accreditation as currently practiced has become a very messy solution to the problem of quality assurance in the United States. It is a product of incremental decisions over time as the system of higher education grew and changed. At each point, adapting accreditation to serve new roles made sense, but less attention was directed to what the final result would—or should—look like. In other words, this is likely not the system one would design if starting from scratch.

Today, accreditation agencies are asked to effectively assess diverse institutions and education providers that extend far beyond the personal experience of any peer reviewer, policymaker, or member of the public. They have to consider issues of local, regional, state, national, and global importance. They need to consider the eventual employers of the educated graduates. They must be mindful of matters concerning institutional autonomy and governmental control. There are questions of accountability, and of proprietary information. There are financial realities to be considered—those of students, institutions, accreditors, investors, and taxpayers.

How, Then, to Approach Accreditation Reform?

Changing accreditation in this complicated and messy system is like playing a game of Jenga, where players take turns removing one block at a time from a tall tower. The tower quickly, and inevitably, becomes unstable as blocks are removed and replaced. Accreditation is at exactly such an unstable phase in the way it supports the edifice of higher education. Although appealing in simplicity, one cannot just pull out one block, push one strand of reform, without impacting many interconnected parts. Reform is clearly needed, but in this contested space different parties disagree on what changes will shore up the system or instead bring it closer to collapse.

Indeed, the perspectives across the chapters here embody nearly intractable disagreement based on different perceptions of how the accreditation system works. Are arbitrary requirements emanating from the Department of Education the primary problem (e.g., as Manning argues) rather than policies designed by accreditation agencies? Or, as LeBlanc asserts, does the Department of Education need to design new requirements for experimental initiatives because accredita-

tion agencies lack the capacity to evaluate programs offered outside of higher education institutions? In cases where even the source of the problem is in dispute, consensus on the solution will surely be elusive. In a system that is messy and complicated, such as is higher education accreditation today, it will be essential to design reform based on a common understanding of the source(s) of the problem.

Quality and Outcomes

Much of the controversy about accreditation revolves around the critical issue of "quality"—what is it and how is it detected? Remarkably, for a system that is designed to assess quality in higher education, it turns out that this basic question is not particularly easy to answer. There are multiple, sometimes contradictory and often simplistic, definitions of quality.

Is Quality Found in Processes or in Outcomes?

There is the familiar "process versus outcome" or "inputs versus outputs" debate, which pits methods and resources against product and consequence.[1] The process/inputs side says that quality itself is amorphous and ever-improving. Therefore, the best option is to have solid systems and resources in place at the outset to increase the likelihood that the result has the ineffable characteristics of quality. The outcome/outputs side argues that the public purpose of higher education is not served by only measuring what is in place when a student arrives on campus. Moreover, outcomes can be just as easy to measure as inputs, and they can serve as a proxy for quality that additionally justifies the investments of students and society in higher education. The positions held by the authors in this volume clearly represent a range of possible definitions of what quality in higher education means.

There are no accreditation agencies that we know of that still rely on simple metrics such as the number of books in the library as a legitimate measure of quality. But, by tradition and by federal statute and regulation,[2] accreditation guidelines do focus much of their attention on the structures the institution has in place to ensure the provision of quality education is possible. Things such as defined curricula, credentialed faculty, student support services, and academic facilities should all be appropriate to the curriculum delivered and related to the mission of the institution. However, consistent with the movement toward accountability in education at all levels, accreditation agencies in higher education have moved to give more consideration for the outcomes of education, and federal requirements now include consideration of "student achievement."[3] National accreditors, for example, have

long been measuring things like graduation rates and job placement. Programmatic accreditors often include attention to the pass rates for certification exams in the relevant professions. Regional agencies typically require institutions to measure several key indicators of student success and develop strategies for their continuous improvement. But accreditation generally has not required institutions or programs to take responsibility for economic or financial outcomes, such as loan repayment, salary levels as return on investment, or the impact of research and teaching on local economies. Instead, they tend to focus on student learning outcomes:[4] what are students supposed to learn, and how do institutions measure it? Manning's characterization of quality assurance as being about capacity and will is an important reminder that quality arises not only from having the right inputs but also from evidence that those resources are put into play toward a desired outcome.

But What Is the Desired Outcome?

A critical issue to be addressed is what desired outcome is being valued. Is it Bergeron's risk management for the government's investment in education? The employability of graduates raised by Koc? The prevention of fraud against students, from Nassirian and Harnisch?

The challenge of defining "quality" would seem to come less from questioning the utility of outcomes as a legitimate indicator in quality assurance and more from the lack of agreement on what those outcomes should be. An important facet of this challenge stems from the diverse set of institutions that accreditation is expected to oversee. The outcomes for a research university are different from a community college. A small private liberal arts college has different goals for its students than a for-profit career training institute. This leads to a mission-driven approach, where accreditation agencies expect institutions to largely develop their own outcomes measures consistent with their distinctive mission.[5] It can be argued that without objective criteria common to all institutions and programs, the outcomes identified can be self-serving and lack comparative meaning. But a one-size-fits-all, easy-to-compare approach clearly ignores real and significant differences between what institutions are trying to accomplish through their curriculum, the purposes students have for attending, and the interests of global partners and eventual employers.

Outcomes Defined and Measured by Whom?

Another facet to consider is the question of what counts not only as a legitimate outcome but also as one that accreditation should measure. In part, this

is about the changing expectations for what is to be achieved by higher education, and how accreditation must keep apace. But there is also a fundamental lack of agreement about what outcomes are relevant, from whose perspective, for which institutions or programs, and for which students. Depending on one's point of view, what counts as evidence of quality in outcomes might range from skills learned to tests passed to programs completed to certifications achieved to employment obtained to salary earned to loans repaid to lives well lived. Further, outcomes might be selected to reflect different goals: Those concerned with taxpayer funds might want a metric that addressed whether an income was achieved and a debt repaid. Those concerned about consumer protection might want measures such as "Do students finish?" "How long does it take?" and "Do they get jobs?"

Even if there were agreement that such accomplishments as repaying student loans is a valuable outcome metric, it is not obvious that accreditation agencies are the appropriate venue for assessing the level of compliance. As it currently stands, accreditation is clearly better at measuring some outcomes and worse at others, but that does not mean the outcomes themselves are better or worse, nor that accreditation itself is failing in the instance of worse measurement. Indeed, one could apply that same notion to other members of the triad: states and the federal government are better at assessing some outcomes and worse at others, but that does not mean that the outcomes themselves are better or worse, nor that states or the federal government are failing in their quality assurance tasks.

The Problem of Measuring Quality

Finally, another facet to consider in the matter of defining "quality" is that even when there is broad consensus on an outcome, and even if it is clearly within the purview of accreditation to evaluate it, the problem of measurement remains. A clear example of this is in student learning outcomes. Direct measures of what students learn compete with indirect indicators of learning. One might look at grade point averages, assess critical-thinking skills, or use the results of an externally administered certification exam; all are different "proxies" for learning. Further, most outcomes can be measured in either quantitative or qualitative fashion, as objective or relative, just as student performance on a given task can be judged globally or assigned detailed points. The lamppost problem in particular still dominates in the assessment of student learning: just as it is a fallacy that the best place to look for your lost keys is where the light is brightest, it is also an error that the best way to look for evidence of learning is where the indicators

are easiest. Indicators are approximations of reality, and they can be further or closer to the truth. Assessing outcomes, therefore, always involves evaluating the measures themselves.

Quality as a Critical Issue

Even with an emerging consensus that the movement toward outcomes-based quality assurance should continue and even accelerate, the questions surrounding outcomes themselves remain a sticking point—what counts as quality, what entity assesses it, and how well that assessment is achieved. The fact that these are continuing questions is not an argument for pushing back on outcomes-based accreditation. Rather, it is an acknowledgment that the problems of accreditation are not solved by simply refocusing our attention on the results of the educational process, and, further, that the question of defining and measuring quality merits careful consideration in designing accreditation reform.

Mission and Purpose

Much like definitions of quality, the very mission of accreditation is also open for debate and dispute. This is a critical issue that quite clearly has changed over time, and many masters currently vie for primacy. As authors such as Bergeron and Studley emphasize, accreditation agencies are increasingly viewed primarily as a regulator to serve the interests of the federal government, reflecting—as Ewell points out—a shift away from how the division of labor that constitutes the regulatory triad is supposed to work. Conversely, Nassirian and Harnisch argue that consumer protection is the most significant—and underserved—role for accreditation. In turn, Matthews and Vibert, like many who work in education and accreditation, emphasize the self-assessment and peer review of institutional activities as the key components of a quality improvement mission.

How Can Accreditation Be Effective in Its Regulatory Assignment?

Whether the regulatory role is an appropriate lens through which to view the accreditation process, the fact is that accreditors have been assigned—and have accepted—this role as the gateway through which federal student aid flows. With that assignment comes many challenges that bear noting. One of these, as Ewell points out, is a "principal-agent" problem. The government takes on the role of the principal and assigns tasks to be completed by its accreditation agency agents. But

the government is a fickle principal. As governmental administrations take on differing postures toward the desired behavior of accreditation agencies, they shift their focus and weaken or strengthen constraints. Accreditation is therefore faced with ever-evolving changes in the rules and expectations, imposed by a principal without the on-the-ground knowledge of higher education that they have as its agent. The institutions themselves also experience the same whiplash effect, but from their perspective, it is the accreditation agency that is acting capriciously. The challenge, then, is to consider not how accreditation should better adapt to its regulatory role but how to develop a more consistent set of regulations that it is tasked to enforce.

Should Higher Education Continue to Be Self-Regulating through Accreditation?

At the same time that accreditors serve as agents of the federal government, they are also organizations composed of member institutions. Given that each of those institutions has its own mission and agenda (including, in most cases, access for their students to federal financial aid), the accreditor is also the agent of its membership. From this angle, the principal-agent problem produces circumstances that might leave the consumer less than adequately protected. The membership model of accreditation, it is argued, affords too many opportunities for professional quid pro quo. The concern extends further, crossing into regulatory capture, where institutional representatives are free to act in self-serving ways to advance their own goals and even to reduce or impair competition. That an accreditor could be effectively constrained to actions that benefit their principals (in this case, institutions) over the interests of the student consumers presents a particular challenge. Despite enacted provisions about accrediting agencies having a required separation and independence from any "affiliated trade association or membership organization,"[6] the relationship between accreditor and institutional members remains a potential challenge for fully fair treatment of consumers. Similarly, although there are provisions built into the accreditation process to prevent quid pro quo expectations or actions, the risk remains for self-dealing in a constituent-driven process. While few would argue for an educational quality assurance system divorced from the knowledge, experience, and expertise of the institutions in which that education occurs, there needs to be a greater recognition of the risks to consumers, and consideration of ways to mitigate those risks. Whether those ways belong to accreditation, or to state or federal government legs of the triad, remains an issue to be addressed.

Can Quality Improvement, Quality Assurance, and Consumer Protection Missions Coexist?

Several of the authors in this volume raise the question of whether accreditation should even serve as the regulatory agent of the federal government. Instead, accreditation should just place the consumer protection role or quality improvement function in the foreground. From Green's chapter, it is shown that there is no US government role in the accreditation of foreign entities, thus the motivation for engaging in the system is all about establishing quality metrics and legitimacy in the global marketplace for education. In their chapter, Neal and Alacbay advocate for accreditors to return to their quality improvement mission and leave the regulatory compliance to a simpler audit process. Indeed, focusing on improving higher education or providing an objective source of information for students would be much simpler when more than $120 billion in federal student aid is not in the picture. In fact, there is merit to the argument from Nassirian and Harnisch that accreditation really is not very good at the regulatory job. And as Bergeron points out, even with accreditation in place, the risks surrounding using taxpayer dollars to support higher education have not gone away. It is clear that that billions of dollars in financial aid motivates institutions in ways that accreditation cannot effectively counter. From this vantage point, delinking eligibility for federal student aid from accreditation approvals would be a natural step. If access to federal student aid were removed from the various functions of accreditation, then the definition and enforcement of quality standards would move to the agreements emerging from the constituent institutions. Decisions about providing effective consumer information could be driven by market forces and targeted to meeting the full range of student needs—not just economic interests—when selecting an institution of higher education. The nuances necessary to capture the variety of US higher education would no longer need to be obscured by metrics that can only clumsily apply to all institutions.

What if Federal Financial Aid Were Not Linked to Accreditation?

While there is some appeal to the idea of delinking federal student aid from accreditation, it does not eliminate the principal-agent problem for institutions. The federal government still needs a way to verify that the federal dollars are being spent wisely. Without accreditation agencies mediating this relationship, colleges and universities might find federal oversight to be more intrusive than current

practice. Nor does delinking accreditation from access to federal student aid necessarily provide relief for accreditation agencies themselves or a solution to quality concerns in higher education. Given that many of the accreditation standards and processes were developed in response to the government's regulatory requirements and the institutional need to have access to a federally recognized accreditor, it is not clear how many would endure, nor what their quality standards and processes would look like, if they returned to being truly nongovernmental organizations. And if federal student aid is awarded without consideration of what is traditionally evaluated as academic quality, then the US system of higher education risks devolving into a consumer product with its import only measured in dollars.

Concerns such as these may not carry much weight in some quarters. If, as critics allege, accreditation is either structurally or philosophically unable to serve effectively as the government's agent for federal student aid access, then it would be time to move to another system. Several models voiced here—including those proposed by Neal and Alacbay, and by Bergeron—represent targeted strategies for solving that federal problem in ways that would arguably be less burdensome and more efficient than either the present system or some other system in which there was more direct federal oversight over questions of "quality." Whether those strategies can provide better accountability for that $120 billion is an open question, especially if the failure of accreditation is traceable in part to the overpowering interest institutions have in maintaining their access to aid at any cost.[7] Any new model might well find itself soon overwhelmed by institutional maneuverings that preserve their access to those funds.

What if There Were More Direct Federal Oversight?

Considering a system with more explicit and direct federal oversight over institutional access to student aid—and the concerns that it prompts about the federalization of higher education—is beyond the scope of this volume. However, we would note that given the amount of money involved, federal involvement in institutional activities is already certain; at this point, it is just a matter of who pays the salaries of those doing the oversight. Looking down a road of greater direct federal oversight quickly leads to the point of the enormous costs that would have to be federally borne if some kind of direct federal action were to evaluate institutional activities. The current funding model, which relies on dues and fees paid by the constituent institutions, provides personnel, knowledge, and expertise to the task (largely without additional compensation), making the quality assurance function of accreditation much less expensive than it otherwise would

be. While there are few who would call for staffing a new federal agency to take over accreditation functions, it would be an instructive exercise to consider what it would cost to remove accreditation agencies from their current role as gatekeepers for federal student aid. Of course, in such an exercise it would also be important to bear in mind that cost is not just in terms of dollars. A complete cost analysis would consider not only dollars but also costs in terms of the impact on the diversity of US higher education; on the relative rights and responsibilities of institutions, states, and the federal government; on procuring needed expert judgment of institutional activities; on international status of the US system of higher education; and, importantly, on quality of education and its impact on students.

Is There Enough Funding to Support the Many Missions?

Even if the link to federal student aid were maintained, there is yet another cost question to be considered. As pointed out by Nassirian and Harnisch, as well as by Studley, the funding level of accreditors is very likely inadequate to the critical tasks they are asked to undertake. If accreditors are to undertake closer evaluation of a wider array of educational models, a broader view of consumer information, and a more detailed set of federal aid outcome indicators, they would likely need more resources to accomplish those tasks successfully. Further, a strong case can also be made for indemnifying accreditation agencies from being sued in their service as quasi-governmental actors. However, it should be noted that funding inadequacies and the case for indemnification can also be taken as evidence of a broken funding model, or as proof that agencies are being asked to do too much.

Mission and Purpose as Critical Issues

Taking together the complexities associated with multiple missions and multiple masters, dismissing either option—to remove or to sustain the link between accreditation and access to federal student aid—out of hand would certainly be unwise. Rather, it would be essential to work carefully through the costs and effects of either plan. Undertaking analysis of the thorny issues involved will certainly clarify what is considered most important to sustain and grow.

Information: Transparency, Relevance, Use, and Accuracy

Across the perspectives in this volume, there are many different roles that information plays in the consideration of quality in higher education. Transparency of information has long been a standard from an accountability perspective,[8] such that data can be used to evaluate performance against a particular expectation or

standard. Information has also increasingly taken on a preventative function, protecting students and the public from fraudulent operations and/or claims about student achievement. Additionally, information is a formative tool that could help prospective students evaluate their options. With information variously serving accountability, preventative, and formative purposes, concerns about its accuracy, relevance, use, and transparency have been increasing.

How Transparent Should (Can) Accreditation Be?

The accreditation process has been notoriously opaque, with much of the activity surrounding quality assurance occurring behind closed doors. There are no reporting mechanisms that open up to public view the full scope of an institutional or programmatic assessment. Further, most disclosures of evaluative information are controlled by the institution under review, not by the accreditation agency conducting the review. For example, the institutional self-study is typically considered a confidential document by the accreditation agency, intended only for internal purposes of evaluating the institution against its standards. The only way the public sees the self-study report is if the institution chooses to publish it. Until recently, many accreditation agencies only reported the result of the accreditation review and would give few details of any areas the review found to need improvement. So, the public might be able to learn that the institution was found lacking in their response to a standard but not be able to tell what the problem was or how it was to be corrected. As agencies have been providing more information over the past decade, the process is not the black box that it once was, and recent federal reporting requirements take information disclosure further.

More and Better Information: For What Purpose?

Even with transparent information, it is often difficult to parse out what is really going on for a given institution. For example, in the actions of one regional accreditor,[9] an institution can receive a result labeled "Denial of Reaffirmation of Accreditation with the Imposition of a Sanction," which actually does *not* mean it lost its accreditation. Alternately, an institution might receive "Accreditation Extended for Good Cause," which actually means it is on probation and might not stay accredited for much longer. Agency policy documents make clear what these designations mean, but the labels do not perform well as signals to the public about the accreditation status of an institution.

Several authors in this volume offer suggestions for improving accuracy, transparency, and meaningfulness. Studley calls for accreditors to take leadership in

making information relevant and understood, Schneider and Peek have called for better availability of the information that accreditors hold, and Vibert suggests that the accuracy of information used by policymakers would be greatly enhanced if it were obtained from the accreditors themselves. These calls all speak to the growing interest in and concern about information derived in the accreditation process. However, it is also important to be clear what goal is being addressed in that increasing interest. Is it the case that the kind of information that accreditation agencies already collect would be useful if only it were more readily available? That would suggest one avenue for reform. Or, perhaps, the increasing calls for transparency may be a way of arguing for new and different information to be collected by accreditation agencies to meet goals of consumer protection or a more publicly accountable version of quality assurance—a goal that would suggest a very different avenue for reform.

Information as a Critical Issue

Regardless of the exact goal being pursued, a convergence here is that accreditors may well need to be adding a new element—information collection and dissemination—to their work that has not been in the traditional portfolio. And, to extend this even further, the possibility of information being available not only to the consumer but to the public lays the groundwork for other opportunities. With cross-institutional, cross-accreditor information available to the accreditors themselves, interaccreditor collaboration could be greatly enhanced, and accreditors could use this information for their own quality assurance and improvement. The challenge in exploiting the opportunities of information, of course, is maintaining the focus on quality improvement that many argue is at the heart of the quality assurance model. As Vibert emphasizes, honest self-assessment and critique is likely to be most useful if there is not a need to reveal every problem or issue that emerges. And, of course, access to every piece of information is not necessarily helpful to the viewing public or prospective consumer. Still, it is clear that more information, and more meaningful information, needs to be public, rather than less.

Challenges of Innovation

One consistent critique regarding accreditation is that it is resistant to innovation. Most of the perspectives in this book address this critical issue in one way or another. Whether it is the constraints of federal regulation, the limitations in accreditor practice, or some combination of the two, getting a designation of quality on a new model or method of higher education is challenging.

Is Accreditation Opposed to Innovation?

Neal and Alacbay argue that a fundamental problem with accreditation is that the membership model of accreditation creates insularity, in that it affords too many opportunities for rigid adherence to professional tradition. Further, there is little to prevent institutional representatives from acting in ways that reduce competition from new providers. With a system of accreditation that is based on institutional membership, the relationship between accreditor and institution remains a potential challenge for welcoming innovation into the system. However, as Manning suggests, to completely disconnect the quality assurance mechanisms and the institutions and programs they oversee would eliminate the essential expert judgment currently freely provided, and would potentially create a compliance checklist where bureaucrats are verifying form over function—a circumstance arguably far worse for innovation.

Can Accreditation Help to Advance Innovation?

Matthews argues that the processes of accreditation are useful to innovative providers, requiring them to consider how their models improve education rather than just change it. More broadly, to advance innovation in higher education, the authors here variously recommend a mix of tolerance, flexibility, consistency, and, in some cases, simply getting out of the way.

The urgency to accommodate evolving new models and methods of higher education often comes from emerging new providers themselves, as Horn and Dunagan attest in their chapter. But the accreditation agencies, as represented by Manning, Matthews, and Vibert, also acutely feel the problem. That is, at the same time that accreditors are tasked with identifying and sanctioning bad actors, they also must be tasked with keeping open the forefront of change in higher education in order to maintain its relevance and global competitiveness. Such openness to change is exactly what quality improvement is about: identifying what can be better and figuring out how to do better. With a valued tradition of helping institutions improve—through doing things differently—accreditors may be proud of their success in facilitating change in one area while at the same time be guilty of creating a barrier to change in another.

Keeping Pace with Change in Higher Education

As higher education has evolved, many recent innovations—especially in technology, as Matthews points out—have been accepted within the accreditation

process. Green's observations concerning aspects of international education show a further extension of the accreditation portfolio. However, in other situations, such as the cases described by Horn and Dunagan, the accreditation process has been much less accommodating. Moreover, some entities that seek to change, to innovate, to do things differently (whether currently accredited or seeking to become so) will find themselves in the odd situation of being both successful in identifying places for improvement and guilty of doing things too differently. Listening carefully, one can hear among accreditors represented here the same calls for tolerance, flexibility, consistency, and getting out of the way that are directed at the federal government, where regulations often afford little nuance to allow accreditors to distinguish between "bad actors" and "innovative actors." And certainly, the innovators might well bristle when they are thereby placed in the former category, rather than the latter, simply because they see a new way to act that has not yet been endorsed.

Is "New" Always Good?

In considering innovation, it is important to note that although innovation tends to be cast in favorable light, not all innovations are good. Some changes fail to make an improvement over existing practice or even end up making things worse. The new is not always better, and accreditation agencies are charged with knowing the difference between a transformative breakthrough and an outrageous scam. It is for this reason that accreditation is, by design, resistant to novelty. The collective endorsement of accreditation standards and outcomes by the stakeholders is the result of a process whereby new ideas are weighed against the old. It is inherently cautious and conservative. The rewards of quickly adopting an innovative practice are often not as great as the risks to students and the financial aid system they rely on if the new idea turns out to be harmful. If quicker responsiveness is desired, then a greater comfort with risk would be needed—and not just by the accreditation agencies. The federal government and the general public must also recognize the trade-offs here. To take the recent difficulties of for-profit higher education, for example, much has been made of the notion that accreditation agencies were asleep at the wheel when students were dropping out or graduating with debt they could not repay. However, accreditor acceptance of the innovation of for-profit higher education occurred partly in response to pressure from the federal government to not be biased against the new form.[10] The recent inability to hold for-profit institutions accountable illustrates the dangers of quality assurance embracing innovation before fully understanding the complete parameters of the change.

Innovation as a Critical Issue

At the same time that what looks like resistance to innovation can be seen as a feature, not a bug, in the design of accreditation policy, accreditation agencies need to be mindful of the power they have in limiting or advancing innovation. As long as they are the gateway to student aid, they have the ability to designate who will win and who will lose in the higher education marketplace. The limits to their authority here are few, largely limited to expensive legal challenges. It is worth considering whether the road for innovation in higher education needs to follow a different quality assurance path. Options such as developing an accreditation agency that is specifically designed to accommodate innovative and outside-the-box ideas may have merit as a way to place institutions that are trying out new, experimental activities into their own category with a different level of oversight connected to the risk they pose. Extending this flexibility to existing accreditors and other education innovators—to create a sandbox in which new models and methods of both education and accreditation might be built, tried out, and tested—would be a promising direction to advance both quality assurance and quality improvement in higher education.

The Path Forward

And, so, what next? The fact that accreditation is a contested space is very clear. It sits at the intersection of traditional higher education autonomy and the increasing importance of colleges and universities in a knowledge economy. It comes from a history of providing a public good, operating in an environment that demands attention to private gains. It has been seen as a gold standard for quality assurance models created in other countries and at the same time has been under nearly constant attack here at home. It has been repeatedly selected by policymakers to serve as the guardian of quality while struggling to reconcile this policy-relevant identity with its institution-relevant and improvement-relevant actions. Accreditation is pushed and pulled but rarely does it face a constant advocate or a consistent critic.

In this tense and contested space, we find a Jenga-like situation with so many interconnecting parts that almost any attempted change creates additional ills that demand ever-more drastic cures. The path forward, above all, demands a reform process that considers carefully each of the critical issues laid out in these pages. While quality in higher education has never been more critical to policy, consensus as to its definition and measurement has yet to be achieved. Accreditation serves

many purposes, all of which are worthy and each of which presents a unique set of challenges to reform efforts. The mission to serve as a gateway to federal student aid, however, has taken on outsized importance that makes reform both indispensable and incredibly risky. More and better information—for accountability as well as for consumer information—is called for, but how best to achieve those goals remains a subject for debate. Keeping pace with the trajectory of higher education represents an important front for reform, where policy is challenged to find ways for both risky experiments and risk management.

While we hesitate to forecast how these critical issues will be addressed, we would hope that the product would be a system of quality assurance that is trustable and trusted, catches the bad actors, helps those who falter improve, and makes room for new models and methods; a system that makes best use of the peer- and disciplinary expert review process, and whose standards and operations demonstrate respect for the uniqueness of institutional mission and also for the commonalities of mission of higher education in the United States; a system that encourages institutions to stay on their toes but not necessarily listen to the same beat nor dance in the same way; a system that recognizes and incorporates the increasingly global realities of higher education; a system that provides the public with the information about quality that helps people decide about how and where and when and whether to pursue higher education; a system in which responsibility and accountability for oversight is clearly assigned and consistently undertaken across federal, state, and accrediting actors; and, as Eaton advocates in the foreword, a system that retains what is valued about the accreditation enterprise—a commitment to mission, academic freedom, and institutional autonomy—while redoubling efforts to put student learning at the center of a transparent quality assurance process.

Uncertainty on the Road Ahead

Creating such a system is not an easy task, and making predictions about the course and pace of accreditation reform at the present juncture would be a fool's errand. Accreditation in its current form could be sustained with tweaks around the edges, doing what is necessary to respond to current critiques within existing frameworks. Or frustration with the status quo could boil over and lead to fundamental change and complete restructuring of the quality assurance system. Perhaps the current accreditation model is never destined to satisfy all parties. And it is certainly true that if policymakers were starting from scratch, they likely would not create this particular model again. But there is no going back. There is

an extant system, which for all its flaws has served a diverse and changing higher education system for more than half a century.

As we anticipate the road ahead, the prediction we can advance with confidence is that accreditation will continue to be a contested space. The tensions surrounding accreditation and the critical issues that they present have been around a long time, and are not likely to be resolved quickly. But there is a dual notion of "edge" that the title of this volume suggests. Ideas from the range of perspectives represented in this volume show accreditation is on the edge of a policy precipice, as the needs of the higher education system and the interests of the many stakeholders may well outstrip its ability to perform. But accreditation is also on the cutting edge of the transformation of higher education, with never a greater potential for reenvisioning a mission to shape a high-quality twenty-first-century educational system. We hope that this volume provides the knowledgeable description and analysis—based on experience and a full grasp of the complexities—necessary to shape the reform efforts to come.

NOTES

1. Teresa A. Sullivan, Christopher Mackie, William F. Massy, and Esha Sinha, *Improving Measurement of Productivity in Higher Education: Panel on Measuring Higher Education Productivity: Conceptual Framework and Data Needs* (Washington, DC: National Academies Press, 2012).

2. See "Recognition of Accrediting Agency or Association," 20 USC § 1099b and "The Secretary's Recognition of Accrediting Agencies," 34 CFR Part 602. See also US Department of Education, "Higher Education Opportunity Act-2008," https://ed.gov/policy/highered/leg/hea08/index.html for a full description of the Higher Education Act (P.L. 110-315) and its implementation.

3. 20 USC § 1099b; 34 CFR Part 602.

4. Linda Krzykowski and Kevin Kinser, "Transparency in Student Learning Assessment: Can Accreditation Standards Make a Difference?" *Change: The Magazine of Higher Learning* 46, no. 3 (2014): 67–73.

5. The federal government has its own version of this in the Higher Education Act, where for-profit and nondegree higher education institutions are required to prepare students for "gainful employment in a recognized occupation," while nonprofit and public institutions are only required to award degrees.

6. S. 1150 (102nd): Higher Education Amendments of 1992, https://www.govtrack.us/congress/bills/102/s1150/text.

7. This is especially the case in for-profit higher education. See Kevin Kinser, *From Main Street to Wall Street: The Transformation of For-Profit Higher Education* (San Francisco: Jossey-Bass, 2006).

8. Alexander McCormick, "Here's Looking at You: Transparency, Institutional Self-Presentation, and the Public Interest." *Change: The Magazine of Higher Learning* 42, no. 6 (2010): 35–43.

9. Southern Association of Colleges and Schools Commission on Colleges, *Sanctions, Denial of Reaffirmation, and Removal from Membership*, 2015, http://www.sacscoc.org/pdf/081705/SanctionPolicy.pdf.

10. Kinser, *From Main Street to Wall Street*.

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